



AR0500 – EMAIL & TEXT MESSAGING

1.0 PURPOSE

To protect personal information from risks such as unauthorized collection, use or disclosure as required by the British Columbia *Freedom of Information and Protection of Privacy Act* (FIPPA).

To ensure reasonable safeguards are utilized to mitigate the risks associated with the use of Interior Health (IH) email or text messaging for the exchange of personal or business sensitive information.

2.0 DEFINITIONS

TERM	DEFINITION
Client	Patients and persons in care in IH facilities and/or programs and their legal representatives.
Confidential Information	For the purpose of this policy, confidential information refers to: <ul style="list-style-type: none"> a) Any electronic information that identifies an individual or that can be combined with other information to identify an individual, excluding business contact information. This definition applies to any individual, living or dead, and also includes information such as Client address, telephone number and health card number (PHN). b) Any electronic corporate information which has not been authorized for disclosure.
Email	Electronic mail (abbreviated "e-mail" or, often, "email") is a store and forward method of composing, sending, storing, and receiving messages over electronic communication systems. Electronic mail records contain recorded information that may be either temporary use or required for ongoing purposes.
Offensive Material	Includes, but is not limited to, pornography, hate literature or any material which contravenes the BC Human Rights Act.
Text Messaging	Also called SMS (Short Message Service), allows short text messages to be sent and received on a mobile phone.
Threat	For the purposes of this policy, a threat refers to all types of malware that are annoyance or malicious software designed to intentionally compromise computer systems and networks.
User	Includes all staff, physicians, independent contractors, students, volunteers, and any other persons acting on behalf of IH.

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3.0 POLICY

3.1 Use of Email & Text Messaging

- All Email, Text Messages and associated information system resources are the property of IH.
- Email and Text Messages are records and as such management of these records must comply with existing legislation, regulations, policies, and standards.
- Email is provided to users primarily for business purposes. Its use and content are subject to audit and *Freedom of Information* (FOI) Requests.
- Email etiquette and best practices should be followed at all times.
- Email is not intended for:
 - the transmission of confidential information external to the IH Email system, unless the information is encrypted in compliance with BC Ministry's of Health approved standards. *Exception: Email may be sent between Interior Health and the other B.C. Health Authorities securely without encryption.*
 - commercial solicitation or for conducting or pursuing personal business interests or those of another organization.
 - distribution of hoaxes, viruses, malware, advertisements, Offensive Material, or harassing messages.
 - subscriptions to non-work related services.
- Email between IH Users and Clients is permitted under the following stringent conditions:
 - IH users involved in Email communication with a Client have reviewed the Staff Information Sheet (Appendix A), understand the restrictions and their responsibilities.
 - The Conditions and Instructions (Appendix B) for Email and Text Message communication has been explained to the Client and verification of their Email address done prior to any Email communications;
 - Email from IH users are only sent using their IH email account;
 - Email is used only for the purposes of:
 - scheduling appointments;

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- providing links to publicly available websites;
- providing general information.
- if there is a need to communicate personal health information or records via Email the information must be appropriately severed and encrypted.
- Text Messaging between an IH User and a Client is permitted under the following stringent conditions:
 - IH users involved in text messaging communication with a client have reviewed the Staff Information Sheet (Appendix A), understand the restrictions and their responsibilities.
 - The Conditions and Instructions (Appendix B) for email and text message communication has been explained to the client and verification of their mobile phone number is obtained prior to any text messaging communications;
 - text messages are sent only from an Interior Health issued mobile phone;
 - text messages are used for the sole purposes of:
 - scheduling appointments;
 - providing links to publicly available websites;
 - providing general information.
- Text messaging of any work related confidential and/or personally identifiable information is not permitted except as noted below.
 - Exception:
 - Microblogging MD is the only IH approved, secured application for text messaging personal information (e.g. information about a patient's condition) between users.
 - See Appendix C for examples of inappropriate use of email and text messaging.

3.2 Personal Use

Although the IH computer system and IH issued mobile phones (as well as other mobile devices such as laptops and USB keys) are provided to users for the primary purpose of business functions, a limited amount of personal use is permitted, on the following understanding:

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- The computer, mobile phones and other mobile computing devices, and all data contained on them including email, text messages, photos, etc are the property of Interior Health, and as such are subject to auditing, monitoring, FOI Access requests and may be disclosed as required by law (e.g. court order or reportable conditions) as well as internally to authorized IH staff).
- Staff must sign up for payroll deductions of a nominal amount if they intend to use their IH supplied mobile phone for regular personal communications.
- Personal use will not:
 - Interfere with work productivity.
 - Disrupt the system and/or harm the reputation of Interior Health.
 - Contravene this or any other Interior Health agreement / policy.
 - Involve any private business activities.

3.3 Use of Personal Devices for Emailing and Text Messaging

- Personal computers (desktops and laptops) may be used to access the IH email system through IH Anywhere or IH Webmail technologies.
- Personal smart phones may be used for limited work purposes by Users to:
 - Access their IH email account using IH Webmail or directly from their smart phone once they submit a Smartphone Agreement via the [Access Management Portal](#).
 - Text messages a co-worker or physician provided there is no communication of personal information (client or employee) or Confidential Information.
- Text messaging clients from personal smart phones is prohibited except as set forth in section 3.1.

3.4 Compliance

Failure to comply with acceptable use standards may lead to termination of access, employment and/or contract, withdrawal of privileges in accordance with Medical Staff Bylaws, and/or professional sanctions.

4.0 PROCEDURE

4.1 All Users will:

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- Include the standard IH email disclaimer as documented in the [Email Signature Guidelines](#) for all initial external email communications.
- Review the Email & Text Messaging between Clients & Health Care Provider – Staff Information Sheet (Appendix A)
- Only email or text a client after explaining and providing a copy of the Conditions and Instructions (Appendix B) for email and text message communication to the client and verifying their email and/or mobile phone number.
- Only utilize their IH email account and/or IH issued mobile phone to communicate non-personal health or Confidential Information with a Client.
- Never use a personal smart phones to text message Clients.
- Not include any personal information of Clients or employees, in any text message sent to co-workers or physicians from any device

4.2 Managers / Chief of Staff will:

- Follow-up on compliance audits in consultation with Human Resources and/or Senior Medical Directors and take appropriate action when required.

4.3 Information Management & Information Technology will:

- Ensure controls are in place to prevent threats from compromising the computer system.
- Conduct audits as necessary.

5.0 REFERENCES

1. AR0100: Acceptable Use Policy
2. AR0400: Privacy & Management of Confidential Information
3. AR0450: Managing Privacy & Security Breaches / Violations
4. AR0600: Internet Policy
5. AT0600 : Mobile Worker Technology
6. AU0100: Standards of Conduct
7. Medical Bylaws
8. Guidelines: Emailing Personal Information
9. Email Etiquette
10. Email Best Practices – A Guide for Users
11. Email Signature Guidelines

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APPENDIX A – Email & Text Messaging between Clients & Health Care Provider – Staff Information Sheet

The request for email and text messaging by Interior Health (IH) staff and clients¹ is becoming more common. However, these types of communications are not fully supported by IH and there are laws that require a public body to ensure personal and confidential information in its custody and control are properly safeguarded. Subsequently IH will permit emailing and text messaging with clients only under the following conditions:

- The Conditions and instructions for email and text message communication have been explained to the client and verification of their email address and/or mobile phone number has been done, and is noted in the permanent chart within the requesting department. Clients must be informed of the inherent risks to using email and text messaging. Implied consent is assumed if, after knowing the risks, the client provides their email address and/or mobile phone number.
- if there is a need to communicate personal health information or records via email the information must be appropriately severed as is needed, (contact your local Health Records department for assistance) and encrypted. [WinZip](#) is appropriate to create a self-extracting encrypted file with password protection.
- Under no circumstances is personal health information to be communicated via text messaging.
- emails to/from the identified health care provider are conducted only through the health care provider's IH email account;
- text messaging with the client must be done using an IH issued mobile phone;
- email and text messaging is used for the primary purposes of:
 - scheduling appointments;
 - providing links to publicly available websites;
 - providing general information.

IH staff must follow the above noted precautionary measures to help mitigate the risks, as well as review and understand Interior Health policies/guidelines related to email and text messaging communication:

- [AR0400 - Privacy and Management of Confidential Information Policy](#)
- [Emailing Personal Information Guidelines](#)

The Bottom Line

- Before engaging in email or text messaging communications, staff must review relevant policies and understand the legal risks associated with email and text messaging.
- Clients must be aware of of communicating by email or text messaging , the limitations of its use by IH staff.
- Data on Interior Health computer systems (including email) and mobile phones are subject to auditing, monitoring, Freedom of Information (FOI) Access requests and may be disclosed as required by law (e.g. court order or reportable conditions). This caution is especially pertinent during any FOI or litigation needs.

¹ Client as defined in policy AR0500 includes patients, residents and persons in care in Interior Health facilities and/or programs and their legal representatives

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THE INTERIOR HEALTH AUTHORITY will use reasonable means to protect the security and confidentiality of information sent and received by email and text messaging however, due to the risks as outlined below, cannot guarantee the security and confidentiality of email and/or text messaging communications, and will not be liable for improper disclosure of confidential information that is not the direct result of intentional misconduct of the public body and/or the named health care provider. Clients must understand the risks associated with the use of email and/or text messaging communications, as well as the restricted conditions permitted for these types of communication with IH health care providers.

Risks associated to email and text messaging include, but are not limited to:

- ☐ Your employer may have a legal right to inspect and keep emails and/or text messages that pass through their system if you use a work computer or mobile phone for communicating with IH.
- ☐ It is impossible to verify the identity of the sender and guarantee that only the intended recipient can read the email or text message.
- ☐ Email can introduce viruses into a computer system, and potentially damage or disrupt my computer.
- ☐ Email and text messages can be forwarded, intercepted, circulated, stored, misdirected and even changed without the knowledge or permission of the health care provider or you.
- ☐ Email and text messages are permanent. Even after the deleting copies of the email/text message, back-up copies may exist on a computer, with an Internet Service Provider (ISP), on a server in another country, or elsewhere in cyberspace.
- ☐ Email and text messages received or sent by IH may be subject to Freedom of Information (FOI) access requests and used as evidence in a court of law.

CONDITIONS FOR USING EMAIL AND/OR TEXT MESSAGING

- ☐ Clients will not use email or text messaging for medical emergencies or other time sensitive matters as the health care provider cannot guarantee messages will be read and responded to within a specific time period.
- ☐ Clients will not email any personal health information, and if there is a legitimate need for the health care provider to communicate personal health information or records to a client, the information must be appropriately severed and encrypted prior to emailing. Under no circumstances will personal health information be communicated via text messaging.
- ☐ Unless encrypted, emails or text messages to/from the Client should only relate to appointment scheduling and general health information that is publicly available.
- ☐ Messages received from the Client containing any details related to diagnosis or treatment will be printed in full and made part of their health record, which may be available to other authorized IH staff. The health care provider will not respond to such matters via email or text messaging.
- ☐ The health care provider will not forward emails or text messages to third parties without the Client's prior written consent, except as authorized or required by law.
- ☐ Email and text messaging communication is not an appropriate substitute for clinical examinations. Clients are responsible for following up on the health care provider's email or text message as needed.
- ☐ If a Client's email or text message requires or invites a response from the health care provider and one is not received, it is the Client's responsibility to follow up with the intended recipient.

INSTRUCTIONS FOR CLIENTS COMMUNICATING BY EMAIL OR TEXT MESSAGING

- ☐ Do not use email or text messaging communication for any emergent matters. Call or visit your health care provider's office or take other measures as appropriate.
- ☐ Limit or avoid using a work computer or mobile phone for communicating with IH.
- ☐ Inform your health care provider of changes to your email or mobile phone number immediately.
- ☐ Review your email or text message for clarity and relevant information before sending.
- ☐ Acknowledge the receipt of any emails or text message received from your health care provider.

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- ☐ Take precautions to maintain the confidentiality of emails and text messages, such as using password protected screensavers and safeguarding your computer and mobile phone passwords.

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APPENDIX C

Examples of Inappropriate Use of Email

1. Sending an email external to Interior Health (or other B.C. Health Authorities) that contains client or confidential information that is not encrypted;
2. Emailing a client without having informed them of the inherent risks as per the Conditions & Instructions (Appendix B)
3. A misdirected email containing client or confidential information;
4. Sending an email that contains client or confidential information to a distribution group – limit distribution to individuals on a “need to know” basis;
5. Sending an email advertising merchandise, non-work related events or information that may be interpreted as a conflict of interest.

Examples of Inappropriate Use of Text Messaging

1. Using a personal mobile phone to text message a client;
2. Texting confidential or personal health information to a client;
3. Texting a client without having first informed them of the inherent risks as per the Conditions & Instructions
4. Texting the wrong client another client's appointment information.
5. Texting work related confidential and/or personally identifiable information to another IH health care provider.

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