

Policy: Information Security for Contractors

Policy Details

Creation Date: _____ Revision Date: _____

Applies to: All Employees and Contractors

Approved by: _____

Purpose

Contractors performing a service for a clinic are subject to clinic privacy policies and procedures. Additional measures are needed to ensure that contractors are aware of and follow privacy policies.

Policy

1. A vendor non-disclosure agreement (VNDA) or contract shall be completed and signed between the clinic and all third parties who may have non direct access to patient information (e.g., cleaning services)
2. An Information Manager Agreement (IMA) will be completed and signed between the practice and all third parties who may have access to systems and assets of the clinic in providing contracted service (e.g., practice management software, IT hardware services, etc.). This agreement will include specific information security provisions for the contractor or will bind the contractor to the clinic's information security policies and procedures.
3. Contractors will be provided a copy of the clinic's privacy and security policies and procedures and will sign a declaration that they have received these documents (please refer to the VNDA or IMA).
4. Any related third-party information security and privacy policies shall be made available to the clinic Privacy Officer upon request, including any updates or revisions that occur after execution of the contract.
5. All contractors and their employees who have exposure to and use clinic information assets and systems shall sign a confidentiality agreement. Third-party service providers shall remind their employees on termination of their continued responsibility to maintain the confidentiality of the clinic's information.
6. Any real or suspected privacy breach must be reported to the clinic Privacy Officer as soon as practicable.
7. Agreements or contracts will include provisions for securely destroying or returning all practice information assets including hardware, system documentation and data upon termination of agreements and in accordance with contract provisions reflecting records retention and data management policy.

Questions?

If you have any questions about this policy, please contact the clinic's Privacy Officer _____.