

To: Patients and/or Substitute Decision Makers

Date: June 6, 2024

From: MHA Privacy Office

**Re: Public Notice of Privacy Breach of Personal Health Information – Spring 2022**

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The Emergency Department at Strathroy Middlesex General Hospital experienced a privacy breach in the **Spring of 2022**.

On May 9, 2022, a potential privacy breach was brought forward to management. There were concerns that a Patient Registration Clerk was sharing patient information with a contracted Security Guard.

Following an investigation, we concluded that a Patient Registration Clerk left their computer open and allowed a contracted Security Guard to view patient records both at their desk and away from their desk. The Patient Registration Clerk also discussed cases of patients who were admitted to the hospital with the Security Guard.

We believe this happened between January 1 and May 9, 2022, and impacted people who were admitted to the hospital during that time.

Neither the Patient Registration Clerk nor the Security Guard remember whose records they viewed. They indicated they were not looking at records of people they knew – they were discussing cases in general. By looking at the Patient Registration Clerk's computer, we concluded that the Security Guard would have been able to view patient information, including examples of the following:

- Names and contact information (like home address and phone numbers)
- Hospital room numbers
- Dates of admission and discharge
- Department or unit of the hospital for admission
- OHIP numbers, and
- Information about diagnosis or health history.

There was no evidence that either the Security Guard or the Patient Registration Clerk shared information about patients with anyone else (other than each other). There was no evidence that either of them used the information against any patient. There is no evidence that they knew any of the patients personally.

Through our investigation, we concluded that the Patient Registration Clerk was allowed to access patient records as part of their job. The sharing of patient information with the Security Guard was not necessary and was not part of the contracted Security Guard's role. Security Guards are not usually allowed to receive details about patients unless there is a patient incident that requires them to be involved for safety purposes. This sharing of information between the Patient Registration Clerk and the contracted Security Guard is against our policies and procedures, and does constitute a privacy breach.

Disciplinary action was taken against both individuals.

We reported the matter to the Information and Privacy Commissioner of Ontario (IPC) on February 24, 2023, following an extensive investigation of the matter, and have been working with the IPC ever since.

We apologize and deeply regret this incident happened. This does not align with our MHA Values and our Patient Declaration of Values (My Rights and Responsibilities). We want all of our patients to feel safe and secure when they come to our hospitals. Every member of our staff receives privacy training on hire, and we do regular privacy updates to all staff and physicians. Our Privacy Office audits health records and follows up on any questionable access that may have taken place.

Since this breach, we have put new policies in place in the Patient Registration Department to protect against the sharing of information with anyone who does not need access to patient records, including Security.

If you were a patient at Strathroy Middlesex General Hospital during the timeframe this privacy breach occurred, we can determine if your patient record was viewed by the Patient Registration Clerk, at no cost to you. If you would like us to review your patient record, or you have any questions, please contact the Middlesex Hospital Alliance Privacy Officer, Kristi White at [privacy@mha.tvh.ca](mailto:privacy@mha.tvh.ca) or 519-245-5295 x 5529.

If you are dissatisfied with our response to this incident, you are entitled to notify the Information and Privacy Commissioner of Ontario who can be reached at 2 Bloor St. E. Suite 1400 Toronto, ON M4W 1A8.

For information on Privacy at Middlesex Hospital Alliance, click here: [Privacy Policy - Middlesex Hospital Alliance \(mhalliance.on.ca\)](https://www.mhalliance.on.ca/privacy-policy)