

HIA Fact Sheet: Shared health information

The *Health Information Act* (HIA) has requirements regarding shared health information.

Overview

Shared health information occurs when two or more custodians have custody of the same electronic health information. For example, a shared electronic medical record system may be used by multiple custodians, including across different physical locations.

Each custodian remains responsible for meeting their obligations under the HIA, even when information is accessed or managed through a common platform or process.

Before becoming sharing custodians, custodians must:

- complete a privacy impact assessment (PIA).
- establish common policies and procedures that define roles and responsibilities and address shared custody

Legal authority

Custodians must ensure they have legal authority under the HIA to collect, use or disclose health information in a shared environment.

Shared custody or control of shared health information does not, on its own, authorize access or use of shared health information.

Privacy impact assessments

Custodians must ensure PIAs for shared-use environments clearly describe how shared health information will be protected and how HIA requirements will be met.

PIAs must include:

- all general HIA PIA requirements
- the common policies and procedures to be adopted.

For more information, refer to Fact Sheet: Privacy Impact Assessments.

Common policies and procedures

Common policies and procedures must cover the following elements:

- how a sharing custodian may cease to be a sharing custodian.
- how affiliates are identified for each sharing custodian.
- how each sharing custodian ensures its affiliates comply with the HIA and its regulations

They must also address:

- access and correction or amendment requests
- disclosure requests for research, including:
 - required approvals and conditions
 - agreements with researchers
 - any associated costs
- individuals' expressed wishes regarding the use of their health information

Information management agreements

If a third party manages health information on behalf of a custodian, the custodian must enter into an information management agreement (IMA) in accordance with the HIA.

For example, if sharing custodians use an IT vendor, they must have an IMA with that vendor.

Related resources

- Fact Sheet: Privacy Impact Assessments

Contact

HIA Help Desk provides general information about the HIA and health information privacy in Alberta.

- Phone: [780-427-8089](tel:780-427-8089) or Toll free: [310-0000](tel:310-0000) before the phone number (in Alberta)
- Email: hiahelpdesk@gov.ab.ca