

Confidentiality of Employee Medical Records

Administrative Procedure

Status:	Active
Effective:	September 2016
Revision Date:	September 2025
Review Date:	September 2029
Responsibility:	Superintendent of Human Resources

Intended Purpose

The Halton District School Board is committed to safeguarding the confidentiality, security, and proper handling of all employee medical information, in compliance with applicable privacy legislation. All employee medical information is collected, used, stored, and disclosed in a manner that protects the individual privacy.

This procedure applies to all active and archived medical information received verbally, in writing, and/or in electronic format.

Procedures:

1. Storage of Records

- 1.1. All employee medical records received by Employee Health and Wellness and Health and Safety, within the Human Resources Department, are stored securely and maintained separately from personnel files.
- 1.2. Medical records are secured in restricted-access databases and, where applicable, physical storage with limited access.

2. Release of Information

- 2.1. No medical information will be disclosed to any third party without the employee's written consent, unless required by law or for the purpose of obtaining legal advice.
- 2.2. Employees may request access to their medical documentation by submitting a written request directly to Employee Health and Wellness.

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- 2.2.1. Independent Medical Examination (IME) reports will be provided directly to the employee's family physician, not to the employee.
- 2.2.2. Doctor-to-Doctor medical communications are considered the property of the Board and not subject to the release request.
- 2.2.3. All other medical documentation (e.g., abilities forms, medical correspondence and/or medical notes) requested by the employee will be provided directly to them upon request.

3. **Respect for Confidentiality**

- 3.1. The confidentiality of all personal and medical information provided to the Board by employees, treating practitioners, or third-party providers (e.g., WSIB, independent consultants, or Long-Term Disability Insurers) will be maintained and respected by all involved parties.

4. **Retention of Medical Records**

- 4.1. Medical records, including those of former employees, are retained in accordance with the Board's records retention schedules and applicable legislation requirements.
- 4.2. Disposal of medical records is conducted in compliance with the Board's policies and with adherence to applicable privacy legislation.

5. **Security**

- 5.1. Administrative safeguards include the use of confidentiality agreements for all staff handling, processing, and managing confidential medical information.
- 5.2. Technical safeguards include secure, password-protected case management software and restricted-access digital storage systems.
- 5.3. Access to medical records is limited to designated personnel.

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Cross-Reference:

Legislation

Municipal Freedom of Information and Protection of Privacy Act

Personal Health Information Protection Act

Human Rights Code

Board Policies, Procedures & Protocols

Attendance Support Program

Disability Management and Support

Individual Work Accommodation

Privacy and Information Management

Revision History

- September 2025 (format change along with revisions to align with best practices and legislation)