



Safeguards Employed for Amplify eReferral Network

In its capacity as a Health Information Network Provider (HINP) for the Amplify eReferral Network under the Personal Health Information Protection Act (PHIPA, 2004), Amplify Care adheres to the following practices for safeguarding personal health information:

1. Individuals have been designated as being responsible for privacy and security compliance.
2. Amplify Care (o/a eHealth Centre of Excellence) has entered into written agreements with Participants in the Amplify eReferral Network.
3. Organizational policies and procedures for privacy and security management have been developed, implemented and are monitored and enforced. A mechanism is in place for reviewing and updating the policies and procedures. Employees, contract staff, students and volunteers are required to comply with these policies as a condition of their employment or applicable relationship with Amplify Care.
4. Amplify Care has contracted third-party service providers to assist in the delivery of the eReferral service and the fulfillment of our accountabilities. These third parties are required to comply with applicable legislation as well as Amplify's organizational policies and procedures for privacy and security management.
5. Confidentiality and/or non-disclosure agreements (as applicable) are in place for all employees, contract staff, students, volunteers and service providers. These agreements contain appropriate measures for breach of privacy, confidentiality, or security, up to and including dismissal or termination of the contract or agreement, as appropriate.
6. Mandatory privacy, confidentiality, and security awareness training is conducted for all employees, contract staff, students and volunteers, at onboarding and annually thereafter. Contracted service providers are required to complete Amplify's privacy & security awareness training or agree in writing to providing substantially similar content to their personnel.
7. In providing the Amplify eReferral Service, Amplify Care personnel have no ability or need to collect, use/access personal health information (PHI). Ocean eReferral employs client-side encryption, and as such, PHI is encrypted using keys held by *Participants* – not by Amplify personnel nor its service providers. If collection, access/use of PHI occurs incidentally or inadvertently in the course of providing the service, Amplify personnel are



required to adhere to the Amplify Privacy Policy and Privacy Incident Management policy, as applicable.

8. Amplify ensures that service providers contracted to deliver the eReferral service maintain audit logs of user activities and system administrator activities. These logs are audited and monitored.
9. In collaboration with applicable service providers, Incident Management and Privacy/Security Breach protocol with respect to personal health information has been developed and implemented.