

TITLE

MOBILE WIRELESS DEVICES AND SERVICESSCOPE

Provincial

DOCUMENT

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NOTE: The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the Definitions section.

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OBJECTIVES

- To outline the allocation and acceptable use of Alberta Health Services (AHS) owned mobile devices as well as personally owned mobile devices used to access AHS resources (hereinafter collectively referred to as “**mobile wireless devices**”) throughout AHS.
- To provide **AHS representatives** with an understanding of the criteria employed in the procurement and allocation of mobile wireless devices, and direction on their accepted use for health care delivery and business services.
- To protect information in the custody and control of AHS while being transmitted and/or stored on mobile wireless devices.

PRINCIPLES

AHS recognizes the vital role mobile wireless devices play in the access, use and transmission of information for health care delivery and business services. It is recognized that some personally owned mobile devices are currently being used by AHS representatives to conduct AHS business.

All AHS owned and personal mobile wireless devices used to access AHS resources shall comply with applicable legislation, the AHS Code of Conduct, and AHS bylaws, policies, and procedures.

APPLICABILITY

Compliance with this document is required by all Alberta Health Services employees, members of the medical and midwifery staffs, students, volunteers, and other persons acting on behalf of Alberta Health Services (including contracted service providers as necessary).

ELEMENTS**1. Eligibility Criteria**

- 1.1 Only AHS-owned mobile wireless devices and personally owned devices that meet AHS' mobility standards shall be allowed on to the AHS network environment. Personal patient-supplied mobile wireless devices are required to connect to the AHS Public Network.
- 1.2 An AHS mobile wireless device may be issued to an AHS representative upon appropriate approval.
 - a) All mobile wireless devices must be approved by the representative's supervisor (minimum, Executive Director), and requested through the IT Customer Service Portal.
 - b) Information Technology Leadership has the ability to deny or restrict approval of new devices based on budget availability and other considerations.
- 1.3 Approval may be based on one or more of the following business needs:
 - a) Member of Executive/Senior Leadership Team and their support staff that are required to be readily accessible on short notice.
 - b) AHS representatives that are required to utilize mobile wireless device(s) as part of their job responsibilities.
 - c) AHS representatives that are frequently away from the office due to job responsibilities.
 - d) AHS representatives that are a key contact during an emergency (e.g. Business Continuity Representative).
 - e) AHS representatives that require a mobile wireless device for safety reasons due to job responsibilities or working conditions (e.g. remote care worker, frequent traveller, work alone, perform hazardous work).
 - f) Required by Management/Supervisor as part of a work or on-call responsibility.
- 1.4 Criteria for transferring or returning an AHS mobile wireless device includes:
 - a) Should an AHS representative move to a new team within AHS, the former and current managers shall determine if/what related mobile wireless device(s) should remain with the team or follow the AHS representative in their new role.

- b) Should an AHS representative leave AHS, their mobile wireless device(s) may be transferred to a new AHS representative assuming the role, or returned to Mobility Services for reallocation.
- c) To transfer a mobile wireless device, the new **user** must contact the Service Desk to initiate reconfiguration of the mobile wireless device(s) and carrier settings by Mobility Services.
- d) Mobile wireless device(s) no longer required must be returned to Mobility Services at an address provided on the Mobility Services Support page on Insite.

2. International Roaming

- 2.1 By default, international roaming is disabled on all AHS mobile wireless devices.
- 2.2 Personally funded international roaming options are available to staff by contacting Mobility Services no less than seven (7) business days prior to travel.
- 2.3 Roaming charges incurred while on any type of personal leave may require reimbursement to AHS, with the exception of representatives who are on call during the leave.
- 2.4 Mobile wireless device usage for out of country business travel must be approved prior to travel taking place:
 - a) A Vice President, or higher does not require approval for out of country business travel, but must contact Mobility Services to request an international roaming package no less than seven (7) business days prior to travel.
 - b) Other AHS Representatives must receive Vice President approval for out of country business travel, and contact Mobility Services after approval to request an international roaming package no less than seven (7) business days prior to travel.
- 2.5 When travelling outside of Canada with an AHS owned device, including travel to the United States, it is the AHS representative's responsibility to read and comply with the *Travelling with Your AHS Mobile Device* guide provided on Insite, be attentive to international data roaming charges which can be significant, and use **Wi-Fi** wherever available. Use of data for personal reasons when roaming internationally, and especially with bandwidth intensive applications, can result in significant data charges for which the AHS representative shall be required to reimburse AHS.

3. Mobile Wireless Device Education for Users

- 3.1 All AHS representatives who are authorized and assigned the use of an AHS owned mobile wireless device for business purposes are required to educate

themselves and be fully familiar on the appropriate terms of use of their device as it pertains to AHS.

- 3.2 All AHS representatives are expected to be knowledgeable of applicable policies, documentation, suggested readings, and self-education resources listed in the Reference section of this policy, and related resources provided on the Mobility Services home page on Insite.

4. Information Security and Privacy

- 4.1 **Health, personal, and business information** in the custody and control of AHS is not to be collected, accessed, transmitted, or stored on mobile wireless devices unless the mobile wireless device meets the information security requirements outlined in the *Information Technology (IT) Acceptable Use Policy* and applicable Information Risk Management Standards.
- 4.2 Collection, access, disclosure, transmission, and storage of information in the custody and control of AHS on a mobile wireless device must be in accordance with the *Health Information Act (HIA)* (Alberta), the *Freedom of Information and Protection of Privacy Act (FOIP)* (Alberta), and applicable AHS policies.
- 4.3 Health, personal, and business information in the custody and control of AHS may only be transmitted by **Short Message Service (SMS or Text Messaging)**, **Multimedia Messaging Service (MMS)**, or any other messaging application (including email) from a mobile wireless device, if the transmission is in accordance with the requirements in the HIA, FOIPP, and applicable AHS policies. Transmission of personal, health, and business information in the custody and control of AHS must meet or exceed the encryption and information security standards in place for transmission of information by electronic mail as set out in the *Transmission of Information by Facsimile and Electronic Mail Policy* and the *Emailing Personally Identifiable Information Procedure*.
- 4.4 Mobile wireless device users must take reasonable precautions when making a call or viewing information on a mobile wireless device to ensure that health, personal, and business information in the custody and control of AHS cannot be overheard and/or viewed by unauthorized parties.

5. Photography, Audio, and Video Recordings

- 5.1 Photography, audio, or video recordings containing personal or health information are to be managed on AHS owned mobile wireless devices or other devices specifically designated for medical recordings, and treated as health information in accordance with the HIA and applicable AHS policies and procedures.
- 5.2 AHS Representatives must not use a personal mobile wireless device to record any photographs, audio, or videos for medical and educational purposes. These recordings must be managed in accordance with the HIA and FOIP, and have the prior written consent of all individuals being recorded, using the Consent to Collect, Use, and Disclose Photograph, Video and/or Sound Recordings Form.

- 5.3 Photography, audio, or video recordings not containing health or personal information are to be managed in accordance with applicable AHS policies and procedures. Whenever possible, AHS representatives are to use AHS owned mobile wireless devices or other recording devices for recordings taken for AHS business purposes.
- 5.4 Patients/clients and visitors using mobile wireless devices or other recording devices to take photographs, videos, or audio recordings in an AHS facility are to be advised that they must respect the privacy of AHS representatives and other patients and visitors who do not consent to being recorded, and must not collect health or personal information of other individuals in the recording. Further guidance for representatives is provided in the *Guidance for Staff Regarding Audio Video Recordings* document.

6. Use of Mobile Wireless Devices in AHS Facilities

- 6.1 Reasonable use of personal mobile wireless device(s) is permitted in AHS facilities in accordance with the principles of the Code of Conduct and applicable policies and procedures
- 6.2 Representatives shall be considerate of their surroundings and ensure privacy and safety when using a mobile wireless device in AHS facilities.

7. Personal Use of AHS Mobile Wireless Devices

- 7.1 Personal use of mobile wireless devices includes, but is not limited to voice, texting, data usage, downloading and utilizing applications, and long distance calling. AHS reserves the right to audit, store or review all uses and data stored on AHS provisioned devices.
- 7.2 Mobile wireless devices provided by Mobility Services are the property of AHS. AHS representatives may use AHS issued mobile wireless devices for personal use provided that such use:
- a) protects the confidentiality, integrity and security of health and personal information and other assets;
 - b) does not interfere in the performance of their employment or contractual duties;
 - c) the services are not used to transmit or send inappropriate, improper, annoying, excessive, threatening or obscene material or to otherwise harass, offend, threaten, embarrass, distress or invade the privacy of any individual or entity, and is used in accordance with the *IT Acceptable Use Policy*;
 - d) does not result in a net material cost to the organization;
 - e) is consistent with professional conduct;

- f) is not for personal or financial gain in accordance with the *Conflict of Interest Bylaw*, and
- g) does not cause support issues from the use of non-business related applications.

7.3 Excessive charges on an AHS mobile wireless device may require reimbursement.

7.4 Mobile wireless devices should not be loaned or shared with others, including friends or family. Usage is the responsibility of the AHS representative assigned to the device.

8. Personal Liability for Mobile Wireless Device Usage Costs

8.1 While AHS representatives may use AHS mobile wireless devices for personal use, in various cases, an AHS representative may be required to reimburse AHS for the following types of personal use expense:

- a) Personal long distance charges.
- b) Minutes, text, data usage, or fees related to premium-rate telephone numbers called for online services such as chat lines, competitions or voting.

9. Lost or Stolen Mobile Wireless Device

9.1 If a mobile wireless device is lost or stolen, the AHS representative must report the incident immediately to the IT Service Desk. The IT Service Desk shall alert Information Risk Management for a follow-up investigation, and if appropriate, Information Risk Management shall notify Information & Privacy in accordance with AHS *Information Security & Privacy Safeguards Policy*.

10. Business Use of Personal Mobile Wireless Device

10.1 An AHS representative may be eligible to request reimbursement for business calls made on their personal mobile wireless device. Written approval from the AHS representative's direct supervisor (minimum, Executive Director) must be obtained before the expense can be incurred. A copy of the approval and documentation of the incurred charges must be included with the AHS representative's expense claim.

10.2 AHS representatives eligible to claim reimbursement for business calls made on their personal mobile wireless device must provide proper documentation indicating they incurred a charge for the business call and submit their claim for reimbursement using an expense claim. Reimbursement will not be made if the business calls were made within a period of unlimited usage included in the rate plan, or where reasonable cost-free alternatives exist.

11. Mobile Wireless Device Use While Driving a Vehicle

- 11.1 In accordance with the *Distracted Driving Regulation (Alberta)*, a driver must use hands-free voice activated functions and not hold, view or manipulate an electronic communication device that can send or receive phone calls, electronic data, electronic mail or text messages while the vehicle is in motion.
- 11.2 Emergency Medical Services (EMS) health care providers are expected to comply with all of the required standards and expectations and outlined in the *Operating Emergency Medical Services Vehicles Policy*.

12. Infection Prevention and Control for Mobile Wireless Devices

- 12.1 AHS mobile wireless devices should be cleaned and disinfected in accordance with the Infection Prevention & Control (IPC) Best Practice Guideline: *Cleaning and Disinfection of IT Equipment*.

DEFINITIONS

AHS Representative(s) means AHS employees, members of the medical and midwifery staffs, students, volunteers, and other persons acting on behalf of AHS (including contracted service providers as necessary).

Health Information means one or both of the following:

- a) diagnostic, treatment and care information; and
- b) registration information (e.g. demographics, residency, health services eligibility, or billing).

Mobile Wireless Devices means smartphones, cellular phones, tablet computers (e.g. iPads) excluding laptop computers, wireless data cards (air-cards), mobile data terminals (MDT), Two-Way Radios, and pagers.

Multimedia Messaging Service (MMS) means a technology which enables mobile devices to exchange messages which include a variety of media, such as photos, video, and audio. MMS can also deliver text-based messages greater than 160 characters in length. MMS operates via a Mobile Wireless Network.

Personal information means recorded information, not covered by the HIA, of any kind stored in any format that identifies an individual including, but not limited to:

- a) address and contact information (including an identifying number or symbol assigned to an individual);
- b) race, ethnic origin, gender or marital status;
- c) educational, financial, employment or criminal history;
- d) opinions of others about the person;
- e) the image of a person on a photograph; and

- f) personal views and opinions of a person (except if these are about another person).

Short Message Service (SMS) means a technology that enables mobile devices to exchange short text-based messages of 160 characters or less via a Mobile Wireless Network.

User means an individual who operates an AHS owned mobile wireless device or utilizes a personally owned mobile device to access AHS resources.

Wi-Fi means a technology allowing devices equipped with the required components to communicate with one another wirelessly in a particular area.

REFERENCES

- Alberta Health Services Governance Documents:
 - *Code of Conduct*
 - *Conflict of Interest Bylaw*
 - *Access to Information (Physical, Electronic, Remote) (#1105)*
 - *Information Security & Privacy Safeguards Policy (#1143)*
 - *Collection, Access, Use, and Disclosure of Information Policy (#1112)*
 - *Contractor Requirements for Security and Privacy of Information and Information Technology Resources Policy (#1107)*
 - *Information Classification Policy (#1142)*
 - *Information Technology Acceptable Use Policy (#1109)*
 - *Transmission of Information by Facsimile and Electronic Mail Policy (#1113)*
 - *Travel, Hospitality & Working Session Expenses – Approval, Reimbursement & Disclosure Policy (#1122)*
 - *Operating Emergency Medical Services Vehicles Policy (#PS-EMS-01)*
- Alberta Health Services Resources:
 - *Freedom of Information and Protection of Privacy Act (FOIP) and Health Information Act (HIA) Information for AHS staff*
 - *Guidance for Staff Regarding Audio Video Recordings*
 - *Infection Prevention & Control (IPC) Best Practice Guideline: Cleaning and Disinfection of IT Equipment*
 - *Information Risk Management Standards*
 - *AHS Mobile Device Guidelines for Travelling*
 - *Self-Help Information for Users of AHS Mobile Devices*
- Non-Alberta Health Services Documents:
 - *Distracted Driving Regulation (Alberta)*
 - *Freedom of Information and Protection of Privacy Act (Alberta)*
 - *Health Information Act (Alberta)*
 - *Traffic Safety Act (Alberta)*

VERSION HISTORY

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October 24, 2017	Revised
Click here to enter a date	Optional: Choose an item