TITLE
CELL PHONES AND OTHER MOBILE DEVICES

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If you have any questions or comments regarding the information in this policy, please contact the Policy & Forms Department at policy@albertahealthservices.ca. The Policy & Forms website is the official source of current approved policies, procedures and directives.

PURPOSE

• To outline the allocation and use of Alberta Health Services (AHS)-owned and personally-owned cell phones used for AHS business and other mobile devices (hereinafter collectively referred to as “mobile devices”) and the acceptable use of all mobile devices in AHS facilities and while driving on AHS business.

• To protect information in the custody and control of AHS while being transmitted and/or stored on mobile devices.

POLICY STATEMENT

AHS recognizes the vital role mobile devices play in the transmission and use of information for health care delivery and business services. Mobile device use is permitted in AHS facilities in accordance with this policy. Individuals are required to be aware of the restrictions for using mobile devices close to medical devices in restricted areas, and the risks associated with distracted driving while using a mobile device.

Mobile device use shall comply with applicable legislation, the AHS Code of Conduct, and AHS bylaws, policies, and procedures, including the Information Technology (“IT”) Acceptable Use policy (#1109).

APPLICABILITY

Compliance with this policy is required by all 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). This policy is subject to all applicable laws.
POLICY ELEMENTS

1. Eligibility Criteria

1.1 An AHS-owned mobile device may be issued to an AHS Representative upon appropriate approval. A request for a:

   a) cell phone must be signed by the AHS Representative’s direct supervisor (minimum Director level);
   b) aircard must be signed by the AHS Representative’s direct supervisor (minimum Director level);
   c) smart phone must be signed by the AHS Representative’s direct supervisor (minimum Senior Director (M5) level); and
   d) tablet must be signed by the AHS Representative’s Vice President (excluding those in temporary authority).

1.2 Approval is based on one or more of the following business needs:

   a) Member of Executive/Senior Leadership Team and their support staff required to be readily accessible on short notice.
   b) AHS Representative is frequently away from the office due to job responsibilities.
   c) AHS Representative is a key contact during an emergency (e.g. Business Continuity representative).
   d) AHS Representative safety due to job responsibilities or working conditions (e.g. travels alone, performs hazardous work).
   e) Required by Management/Supervisor as part of an AHS Representative’s work or “on call” responsibilities.

1.3 Information Technology (IT) will review approved requests for the purposes of allocating AHS-owned mobile devices based on consistent provincial allocation of resources and available funding.

2. Roaming

2.1 By default, international roaming will be disabled on all AHS-owned mobile devices.

2.2 Staff may notify IT Mobility Services to request re-enablement of international roaming ability if the:
a) purpose of international travel is to conduct AHS business and approved at the Vice President level or higher; or

b) **user** is a Vice President or higher; or

c) user is required to work during their personal leave (Vice President or higher authorization is required).

2.3 AHS Representatives that do not meet the above criteria but wish to have a roaming package added to their device at their own cost can do so. In this case the user will be responsible for all costs related to international roaming.

2.4 Apart from the criteria set out above, AHS Representatives travelling for personal reasons are not permitted to use AHS-owned mobile devices while outside of Canada.

2.5 AHS Representatives must be aware of roaming charges, and take necessary steps to limit international usage including, but not limited to avoiding any:

a) non-AHS related roaming usage; and

b) high-bandwidth activities (e.g. audio or video streaming services, turn-by-turn navigation, downloading large files/attachments).

2.6 AHS Representatives are responsible for reading and complying with the Mobile Device Guidelines for Travelling prior to and during travel outside of Canada.

3. Mobile Device Education for Users

3.1 All AHS Representatives who require the use of an AHS-owned mobile device or a personally-owned device to be used for business purposes are required to educate themselves and be fully conversant on the appropriate use of their device as it pertains to AHS.

3.2 Pertinent policies, documentation, suggested readings and links to self-education resources are hosted on the IT Mobility Services home page on AHS 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 devices unless the mobile device meets the information security requirements outlined in the Information Technology (“IT”) Acceptable Use policy (#1109) and applicable Information Risk Management program standards.

4.2 Collection, access, disclosure, transmission, and storage of information in the custody and control of AHS on a mobile device must be in accordance with the
Health Information Act ("HIA") (Alberta), the Freedom of Information and Protection of Privacy Act ("FOIPP") (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 and Blackberry Messenger) from a mobile 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 (#1113).

4.4 Mobile device users must take reasonable precautions when making a call or viewing information on a mobile 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.

4.5 A lost or stolen AHS-owned mobile device must be reported by the user immediately to the IT Service Desk. The IT Service Desk will alert Information Risk Management of a lost or stolen mobile device for follow-up investigation, and if appropriate, Information Risk Management will notify Information & Privacy in accordance with AHS Information Security & Privacy Safeguards policy (#1143).

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 devices or other devices specifically designated for medical recordings, and treated as health or personal in accordance with the HIA & FOIPP (if applicable) and applicable AHS policies and procedures. AHS representatives must not use a personal mobile device to record any photographs, audio, or videos for medical purposes. These recordings must be managed in accordance with the HIA and FOIPP, and have the written consent of all individuals being recorded.

5.2 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 devices or other recording devices for recordings taken in AHS facilities.

5.3 Patients/clients and visitors using mobile 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 AHS staff is provided in the Guidance for Staff Regarding Audio and Video Recordings.
6. Use of Mobile Devices in AHS Facilities

6.1 Use of mobile devices is permitted in non-restricted areas of AHS facilities in accordance with this policy. Mobile devices that connect to a cellular network are to be turned off or set in “airplane mode” within one (1) meter of functioning medical devices in restricted areas. Restricted areas include, but are not limited to:

a) critical/-intensive care units;
b) operating rooms;
c) emergency departments;
d) post anaesthetic recovery rooms;
e) neonatal intensive care units;
f) cardiac telemetry units; and
g) other areas designated by the facility’s leadership.

6.2 Two-way radios are to be used at least three (3) meters away from functioning medical equipment when sending a transmission in restricted areas.

6.3 Individuals who suspect any medical equipment malfunctions are being caused by electromagnetic interference (“EMI”) are to ensure that the mobile device use is immediately stopped around the equipment and to report the incident to the Clinical Engineering Department. Equipment malfunctions related to EMI may include, but are not limited to:

a) apparent differences between a patient’s condition and the data provided by a medical device or monitor; and
b) intermittent equipment malfunction or alarm signal during mobile device use or certain weather conditions.

7. Personal Use of an AHS-Owned Mobile Devices

7.1 Mobile devices purchased by AHS are the property of AHS. AHS Representatives may use AHS-owned mobile devices for personal use (e.g. voice, texting, data usage, downloading and utilizing applications, and long distance) provided that such use:

a) does not interfere in the performance of their employment or contractual duties;
b) is consistent with professional conduct;
c) is not for personal or financial gain; and

d) does not significantly exceed the monthly cost to AHS.

7.2 The AHS Representative’s personal use of the mobile device resulting in a cost to AHS must be avoided, particularly during business hours and where alternatives exist. Excessive use for personal reasons, especially with bandwidth intensive applications and when roaming internationally, can cause significant additional data charges resulting in a net material cost.

7.3 While AHS Representatives may use department mobile devices for personal use, in various cases, in relation to the content of this policy AHS Representatives will be required to reimburse AHS for the personal use expenses, for amounts that excessively exceed monthly costs to AHS including, but not limited to:

a) roaming charges not in accordance with Section 2 of this policy;

b) personal long distance charges;

c) excessive minutes, text, and data usage; and

d) fees related to online contests or services.

7.4 Should a device be lost, stolen, or damaged in excess of one time during the 36-month contract term of the device, an AHS Representative shall become personally liable for the cost of repairing or replacing the device.

8. Business Use of Personal Mobile Devices

8.1 In special circumstances, an AHS Representative may be eligible to claim reimbursement for business calls made on their personal mobile device. Written approval from the AHS Representative’s direct supervisor (minimum Senior Director (M5) level) must be obtained before the expense can be incurred. A copy of the approval must be sent with the expense claim.

8.2 Eligible AHS Representatives 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 existed.

9. Mobile Device use while Driving a Vehicle

9.1 While the Traffic Safety Act (Alberta) permits the use of hands-free devices in vehicles, AHS is committed to safety, as set out in the AHS Code of Conduct, and recognizes that the risks associated with distracted driving extend to hands-free use of mobile devices in vehicles. Mobile device use by AHS representatives, whether hand-held or hands-free, while driving a vehicle in the performance of their
work duties is not permitted except when responding to an Emergency. On-duty Emergency Medical Services ("EMS") employees may use mobile devices or other devices that are required to fulfill their work duties in a vehicle.

9.2 Mobile device use for emergency purposes or by EMS employees must be in accordance with the Traffic Safety Act (Alberta) and the Distracted Driving Regulation (Alberta).

DEFINITIONS

AHS Representatives means AHS employees, members of the medical and midwifery staffs, students, volunteers, and other persons acting on behalf of AHS.

Department means any division, unit, clinic, program, portfolio, sector, section, or service within the AHS organizational structure.

Health information means information that identifies an individual and is stored in any format that relates to:

a) diagnosis, treatment and care; and

b) registration information (e.g. demographics, residency, health services eligibility, or billing).

Mobile device means a portable electronic device, whether AHS-owned or personally owned, including but not limited to:

a) cell phones (voice-only mobile device);

b) smart phones (voice and data enabled mobile device);

c) tablets (e.g. iPads);

d) Personal Digital Assistants ("PDA");

e) Pocket PCs;

f) Two-way pagers;

g) aircards (mobile broadband modems); and

h) any device connecting to a mobile broadband network.

Personal information means recorded information, not including health information, 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; and

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

**Restricted area** means a clinical care area where the risk of EMI resulting from mobile device use is high due to the amount of complex medical equipment used in the area.

**User** means an individual who operates a personal or AHS-owned mobile device.

**REFERENCES**

- FORM: Request for Mobile Device (#09652)
- AHS Code of Conduct
- AHS Mobile Device Guidelines for Travelling
- AHS Guidance for Staff Regarding Audio and Video Recordings
- AHS Bylaws and Policies
  - Conflict of Interest Bylaw
  - Access to Information (Physical, Electronic, Remote) (#1105)
  - Collection, Access, Use, and Disclosure of Information (#1112)
  - Contractor Requirements for Security and Privacy of Information and Information Technology Resources (#1107)
  - Information Classification (#1142)
  - Information Technology Acceptable Use (#1109)
  - Procedure: Personally-Owned Mobile Devices (Under Development)
  - Transmission of Information by Facsimile and Electronic Mail (#1113)
  - Travel, Hospitality and Working Session Expenses – Approval, Reimbursement and Disclosure (#1122)
- Freedom of Information and Protection of Privacy Act (Alberta)
- Health Information Act (Alberta)
- Traffic Safety Act (Alberta)
- Distracted Driving Regulation (Alberta)

**REVISIONS**

None