



MOBILE WIRELESS DEVICES AND SERVICES

DOCUMENT # YAN-IT-903	INITIAL APPROVAL DATE
APPROVAL LEVEL Administration	INITIAL EFFECTIVE DATE
SPONSOR Information Technology	REVISION EFFECTIVE DATE
CATEGORY Client Safety	NEXT REVIEW

OBJECTIVES

- To outline the acceptable use of **Your Agency Name (YAN)** owned mobile devices as well as personally owned mobile devices used to access **YAN** resources (collectively referred to as "**mobile wireless devices**").
- To provide **YAN** employees 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 **YAN** while being transmitted and/or stored on mobile wireless devices.

PRINCIPLES

YAN recognizes the important 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 **YAN** employees to conduct **YAN** business.

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

APPLICABILITY

Compliance with this document is required by all **YAN** employees, and other persons acting on behalf of **YAN** (including contracted service providers as necessary).



ELEMENTS

1. Eligibility Criteria

1.1 Only **YAN**-owned mobile wireless devices and personally owned devices that meet **YAN**'s mobility standards shall be allowed in the **YAN** network environment.

1.2 A **YAN** mobile wireless device may be issued to a **YAN** employee upon appropriate approval.

- a) All mobile wireless devices must be approved by the **YAN** Owner and requested through the Human Resources Department.
- b) **YAN** Management 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) **YAN** Management and their support staff that are required to be readily accessible on short notice.
- b) **YAN** employees that are required to utilize mobile wireless device(s) as part of their job responsibilities.
- c) **YAN** employees that are frequently away from the office due to job responsibilities.
- d) **YAN** employees that are a key contact during an emergency (Care Manager, Scheduler).
- e) **YAN** employees that require a mobile wireless device for safety reasons due to job responsibilities or working conditions (i.e. remote care worker, field supervisor, 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 a **YAN** mobile wireless device includes:

- a) Should a **YAN** employee move to a new role within **YAN**, the former and current managers shall determine if/what related mobile wireless device(s) should remain with the employee or follow the **YAN** employee in their new role.
- b) Should a **YAN** employee leave **YAN**, their mobile wireless device(s) may be transferred to a new **YAN** employee assuming the role, or returned to Human Resources for reallocation.
- c) To transfer a mobile wireless device, the new **user** must contact Human Resources to initiate reconfiguration of the mobile wireless device(s) and carrier settings.
- d) Mobile wireless device(s) no longer required must be returned to Human Resources at **YAN** office.



2. International Roaming

2.1 By default, international roaming is disabled on all **YAN** mobile wireless devices.

2.2 Personally funded international roaming options are available to staff by contacting Human Resources 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 **YAN**, with the exception of employees 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) Management does not require approval for out of country business travel, but must contact Human Resources to request an international roaming package no less than seven (7) business days prior to travel.
- b) Other **YAN** employees must receive Management approval for out of country business travel, and contact Human Resources 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 a **YAN** owned device, including travel to the United States, it is the **YAN** employee's responsibility to 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 **YAN** employee shall be required to reimburse **YAN**.

3. Mobile Wireless Device Education for Users

3.1 All **YAN** employees who are authorized and assigned the use of a **YAN** 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 **YAN**.

3.2 All **YAN** employees 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.

4. Information Security and Privacy

4.1 Health, personal, and business information in the custody and control of **YAN** 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 **YAN** 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 **YAN** policies.

4.3 Health, personal, and business information in the custody and control of **YAN** 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 **YAN** policies. Transmission of personal, health, and business information in the custody and control of **YAN** 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*.

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 **YAN** 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 **YAN** owned mobile wireless devices or other devices specifically designated for medical recordings, and treated as health information in accordance with the HIA and applicable **YAN** policies and procedures.

5.2 **YAN** Employees 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 **YAN** policies and procedures. Whenever possible, **YAN** employees are to use **YAN** owned mobile wireless devices or other recording devices for recordings taken for **YAN** business purposes.

5.4 Clients and visitors using mobile wireless devices or other recording devices to take photographs, videos, or audio recordings in a **YAN** office (or client residence) are to be advised that they must respect the privacy of **YAN** employees and clients and visitors



who do not consent to being recorded, and must not collect health or personal information of other individuals in the recording.

6. Use of Mobile Wireless Devices in YAN

6.1 Reasonable use of personal mobile wireless device(s) is permitted in YAN office and Client residences in accordance with the principles of the Code of Conduct and applicable policies and procedures.

6.2 Employees shall be considerate of their surroundings and ensure privacy and safety when using a mobile wireless device in YAN business locations and client residences.

7. Personal Use of YAN 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. YAN reserves the right to audit, store or review all uses and data stored on YAN provisioned devices.

7.2 Mobile wireless devices provided by YAN are the property of YAN. YAN employees may use YAN 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 agency.
- e) Is not for personal or financial gain in accordance with the *Conflict of Interest Policy*.
- f) Does not cause support issues from the use of non-business related applications.

7.3 Excessive charges on a YAN 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 YAN employee assigned to the device.



8. Personal Liability for Mobile Wireless Device Usage Costs

8.1 While YAN employees may use YAN mobile wireless devices for personal use, in various cases, a YAN employee may be required to reimburse YAN 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, etc.

9. Lost or Stolen Mobile Wireless Device

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

10. Business Use of Personal Mobile Wireless Device

10.1 A YAN employee may be eligible to request reimbursement for business calls made on their personal mobile wireless device. Written approval from the YAN employee's direct supervisor (minimum, Care Manager) 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 YAN employee's expense claim.

10.2 YAN employees 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.



12. Infection Prevention and Control for Mobile Wireless Devices

12.1 **YAN** 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

YAN Employee(s) means **YAN** employees and other persons acting on behalf of **YAN** (including contracted service providers as necessary).

Health Information means one or both of the following:

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

Mobile Wireless Devices means smartphones, cellular phones, tablet computers (i.e. iPads) excluding laptop computers.

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.
- 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 a **YAN** owned mobile wireless device or utilizes a personally owned mobile device to access **YAN** resources.



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

REFERENCES

YAN Documents:

Code of Conduct
Conflict of Interest
Access to Information (Physical, Electronic, Remote) Policy
Information Security & Privacy Safeguards Policy
Collection, Access, Use, and Disclosure of Information Policy
Contractor Requirements for Security and Privacy of Information and Information Technology Resources Policy
Information Classification Policy
Information Technology Acceptable Use Policy
Transmission of Information by Facsimile and Electronic Mail Policy
Travel, Hospitality & Working Session Expense, Approval, Reimbursement & Disclosure
Guidance for Staff Regarding Audio Video Recordings
Infection Prevention & Control (IPC) Best Practice Guideline: Cleaning and Disinfection of IT Equipment
Information Risk Management Standards

Non-YAN Documents:

Distracted Driving Regulation([Alberta](#))
Freedom of Information and Protection of Privacy Act ([Alberta](#))
Health Information Act ([Alberta](#))
Traffic Safety Act ([Alberta](#))

Alberta Health Services Resources:

Freedom of Information and Protection of Privacy Act (FOIP) and Health Information Act (HIA)