

Data use policy



DECEMBER 2018

Purpose

Practice Greenhealth has adopted this policy to govern the use of information it obtains from its members. Practice Greenhealth is committed to protecting the confidentiality of any sensitive information shared with the organization. Practice Greenhealth takes this responsibility very seriously. Practice Greenhealth has established and implemented this policy to safeguard the privacy of such member information, including any information received by Practice Greenhealth and/or its affiliated entities, including Health Care Without Harm and other entities within its network (collectively, "Affiliates"), collected through its awards programs and other organizational initiatives. Practice Greenhealth will only use or disclose member information as permitted by this policy.

Scope

This policy governs all information received by Practice Greenhealth from its members that contains member-specific data ("Information"). This policy applies to all Practice Greenhealth employees, officers, agents, and representatives, as well as all Affiliates, external contractors, or third-party service providers who receive Information governed by this policy through or on behalf of Practice Greenhealth. This policy applies to all Information collected, maintained, transmitted, stored, retained, or otherwise used by Practice Greenhealth regardless of the media on which that Information is stored.

Requesting, using, and disclosing information

Requesting and collecting information

Practice Greenhealth requests and collects Information from members for a variety of purposes, including without limitation its Environmental Excellence Awards ("EEA") program, and for other various legitimate operational purposes. Practice Greenhealth will only request and collect information which is reasonably necessary to accomplish its purposes or as necessary to comply with the law.

Notice

Before requesting Information from a member, Practice Greenhealth will notify the member of this policy and provide the member with the opportunity to review this policy. This policy will also be available to any member upon request.

Use and disclosure of information

Practice Greenhealth routinely gathers and combines Information from more than one member to create aggregate data (i.e., stripped of any provider-specific identification data),

such as data benchmark reports. Practice Greenhealth's use and disclosure of Information depends on whether it will disclose provider-specific or aggregate data, as explained below.

Information gathered through the EEA program and other awards programs is only shared within Practice Greenhealth and its Affiliates for award scoring and review, hospital/health system performance report generation in consultation with the organization's member engagement advisor, and for identification of progress and innovation in this field.

In addition, Practice Greenhealth may share Information with external contractors or researchers (i.e., not Affiliates) for purposes of assisting with award application review and research (e.g., deeper analysis of awards data for specific environmental or health impact or financial savings, such as use of various anesthetic gases). However, each external contractor/researcher with whom Practice Greenhealth partners or contracts is required to enter into a non-disclosure agreement which will prohibit the external party from using or disclosing the Information other than for purposes identified by Practice Greenhealth and consistent with this policy. Finally, Practice Greenhealth may disclose Information as necessary when publicly announcing award nominees and recipients, including to describe and promote the nominees and recipients.

Except for the limited circumstances set forth above, Practice Greenhealth will not share member-specific Information externally unless Practice Greenhealth or an Affiliate obtains express written or verbal permission in advance from the member entity or health system whose data is being shared. For example, except for purposes of announcing award nominees and recipients, Practice Greenhealth will not respond to any media inquiries with provider-specific data unless advance authorization is obtained from that member entity or health system. Practice Greenhealth may disclose data gathered through its awards programs on an aggregate basis (i.e., stripped of any provider-specific data) for various operational purposes including remuneration, including but not limited to data benchmark reports, without authorization.

Our employees, agents, and representatives will only access Information when it relates to and is necessary to perform their job duties. They will only share Information with another employee, agent, or representative if the recipient has a job-related need to know the Information.

Security

Practice Greenhealth is committed to ensuring that Information is secure. In order to prevent unauthorized access or disclosure of Information, Practice Greenhealth has put in place physical, electronic and managerial procedures to safeguard and secure the Information Practice Greenhealth collects online.

Retention

Practice Greenhealth will keep Information for the amount of time it is needed to fulfil the legitimate operational purpose for which it was collected or to satisfy a legal requirement.

Educating employees and monitoring contractors

All personnel who have access to Information will be informed of this policy, the treatment of Information, and the importance of compliance with this policy. In addition, as stated above, whenever Information is entrusted to an external third-party (e.g., contractor, researcher, vendor, or service provider), proper management over the third party's handling of that Information will be ensured through appropriate contracts, which may include among other protections a non-disclosure agreement as described in the previous section of this policy. Practice Greenhealth will be responsible for monitoring the performance of the third parties with respect to their use and disclosure of Information. Practice Greenhealth will terminate any relationship (and any applicable contract or agreement) with any third party that does not adhere to the terms and conditions of this policy or the applicable non-disclosure agreement.

Monitoring compliance and enforcement

Practice Greenhealth has an internal team that is responsible for administering and overseeing implementation of this policy and, as applicable, developing related operating procedures, processes, policies, notices, and guidelines. If a member has any concerns or questions about Practice Greenhealth's data use policy, they can contact:

privacy@hcwh.org.

Practice Greenhealth will conduct periodic reviews and audits to assess compliance with this policy. All principles described in this policy must be strictly followed. A breach of data protection guidelines may invoke disciplinary or legal action.

Amendment and revision

This policy may be revised from time to time. This policy was last revised on December 19, 2018.