

Record Keeping Safety & Security Tips

Behaviour analysts take reasonable steps to protect client records from loss, theft, and unauthorized access, use, or disclosure. For detailed guides on record keeping security visit the Information and Privacy Commissioner of Ontario website www.ipc.on.ca



Transportation

Take the most direct route and limit unnecessary stops. Keep paper records out of plain view of others. Keep briefcases or backpacks containing records within arm's length or briefly locked in trunk of vehicle.

Keep encrypted and password protected laptop computer(s) and/or storage media (e.g., memory sticks, portable hard drives) in a protective case. Keep case within arm's length or briefly locked in trunk of vehicle.



Storage

Secure paper records in a locked cabinet with controlled access.

Secure electronic documents using strong passwords and strong encryption with controlled access.

For each client record track the existence and the location of paper and electronic components if both exist.



Transmission

Transfer paper records in person using sealed envelopes, or by traceable mail or courier.

Transfer electronic records, only with express consent. Use strong encryption and/or strong password protection.



Retention

Retain records as required by law for the setting, clinician, and client group.

Retention period begins after last contact with client and is the same for paper and electronic records.

How Long?

Min 7 years (BACB®)

10 years (e.g., CPO)

10 years after age 18 (e.g., CASLPO)

Longer (Public Hospitals Act [1990])



Destruction

After the specified retention period has passed, destroy all copies of paper records in a way that prevents re-assembly or identification.

Destroy all versions of electronic records in a manner that prevents retrieval.

When disposing of electronics previously used to store client records, overwrite storage media using a high security option or destroy the media (e.g., hard drive) if non-functional.



Accountability

For each client, track the name, the last contact, location of paper and electronic records, retention date, destruction date, method of destruction, person who destroyed the records, and confirmation of destruction.

More information about Record Keeping can be found at www.ontaba.org