

BACKGROUND

The Personal Data Protection Act (PDPA) came into force on 2 July 2014. As SingHealth institutions handle the largest patient flow and patient data in Singapore, we face a high risk of personal data breaches each day if we do not take an active approach to ensure PDPA compliance.

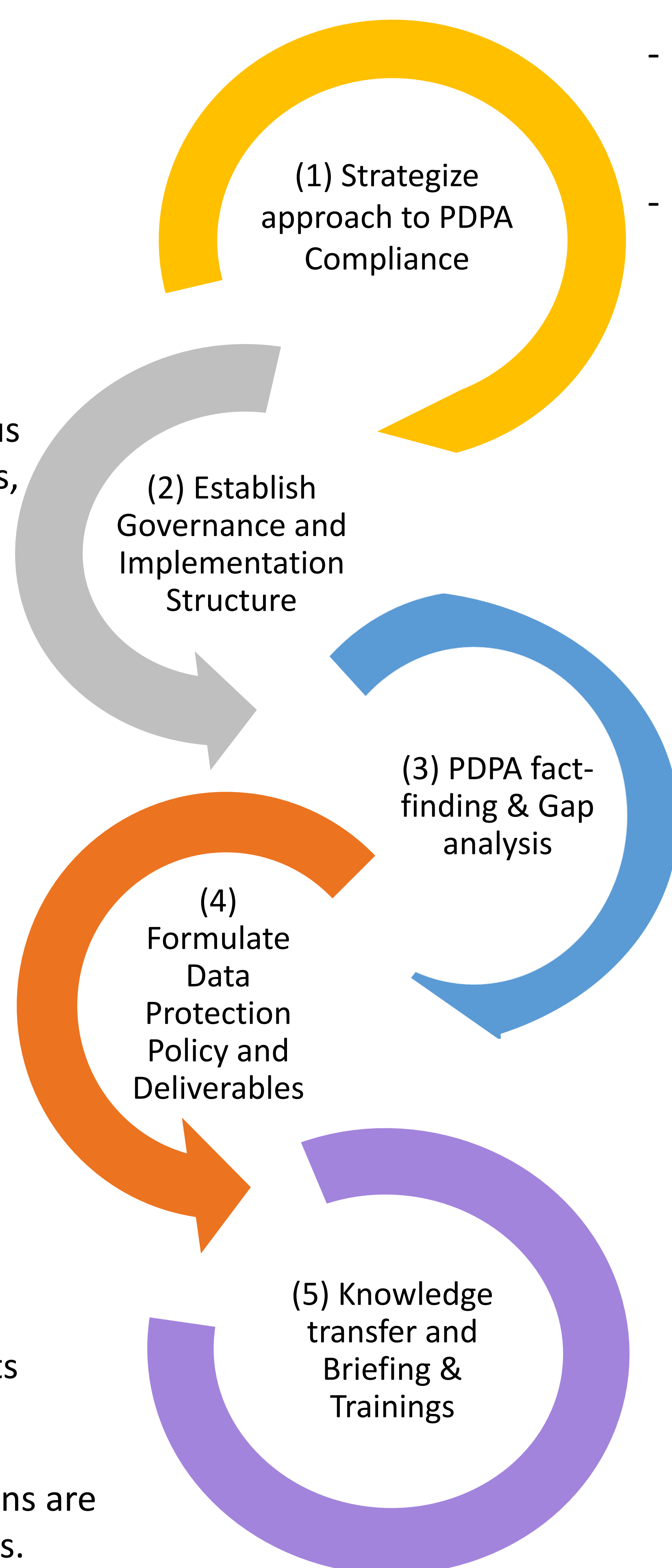
Patient data protection is a continuum of our care for patients.

AIMS

- Ensure SingHealth institutions are compliant with PDPA
- Minimize interference with day-to-day healthcare operations
- Implement policies and procedures to address compliance with PDPA
- Foster a One SingHealth approach when addressing PDPA matters

METHODOLOGY

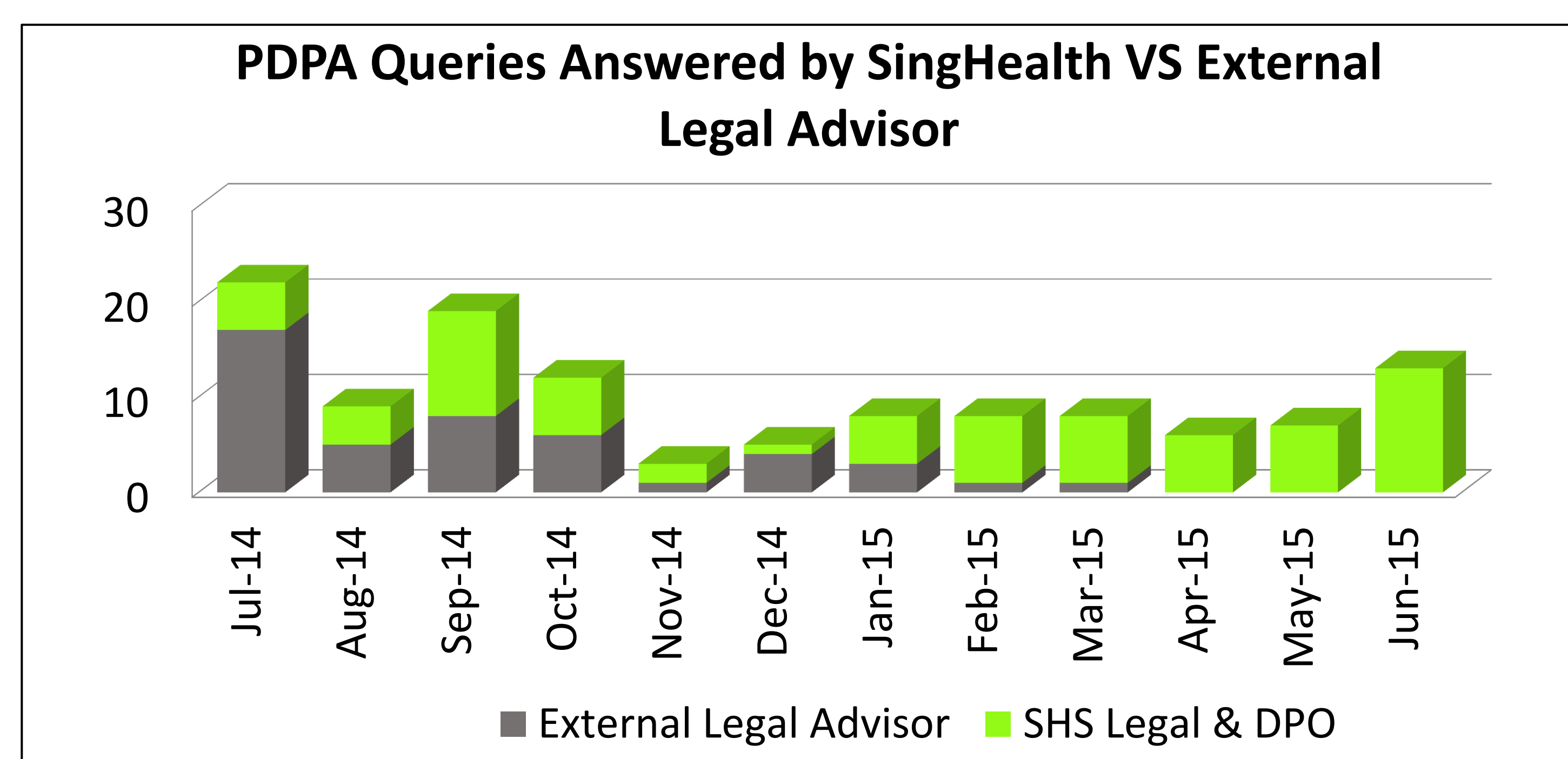
- (1) A cluster-wide PDPA Compliance Program was initiated to review and ensure all SingHealth institutions are compliant with the new law.
- (2) An integrated hub-and-spoke governance structure was implemented in consensus with all SingHealth institutions, with a central Data Protection Office (DPO) working closely with institution DPO coordinators.
- (3) Healthcare processes involving personal data handling, use and disclosure were fully mapped and reviewed. Processes were put in place to handle PDPA queries and issues.
- (4) A cluster wide Data Protection Policy, Human Resource Data Protection Policy, Employee Guide on PDPA tools was formulated with MOH guidance and inputs from institutions.
- (5) Training and sharing sessions are conducted on a continual basis. Knowledge transfer was effected between external legal counsel and SingHealth Legal and DPO Offices to sustain PDPA compliance efforts.



RESULTS

The SingHealth PDPA Compliance Program has resulted in:

- Achieving a coherent and integrated Data Protection Policy for all SingHealth institutions and Centres that serves as a common reference point
- Strong partnership between Institutions' DPO offices, Domain stakeholders, SingHealth Legal, external legal counsel to resolve cross-institution patient data sharing issues, research queries, implementation issues etc.
- Sustainable PDPA compliance capability build up through effective knowledge transfer from external legal counsel, with increasing queries answered by SingHealth DPO office and SingHealth Legal (as shown in Graph 1)



Graph 1: PDPA Queries Answered by month

- Central resource for PDPA Compliance tools, training materials, FAQs, consent forms that can be accessed by anyone in the cluster at: <http://mysinghealth/singhealth/pdpa>
- Increased PDPA awareness through training/sharing sessions (Table 1 & Graph 2) for staff across all institutions. These sessions are generally well received (>90% favourable feedback on average)

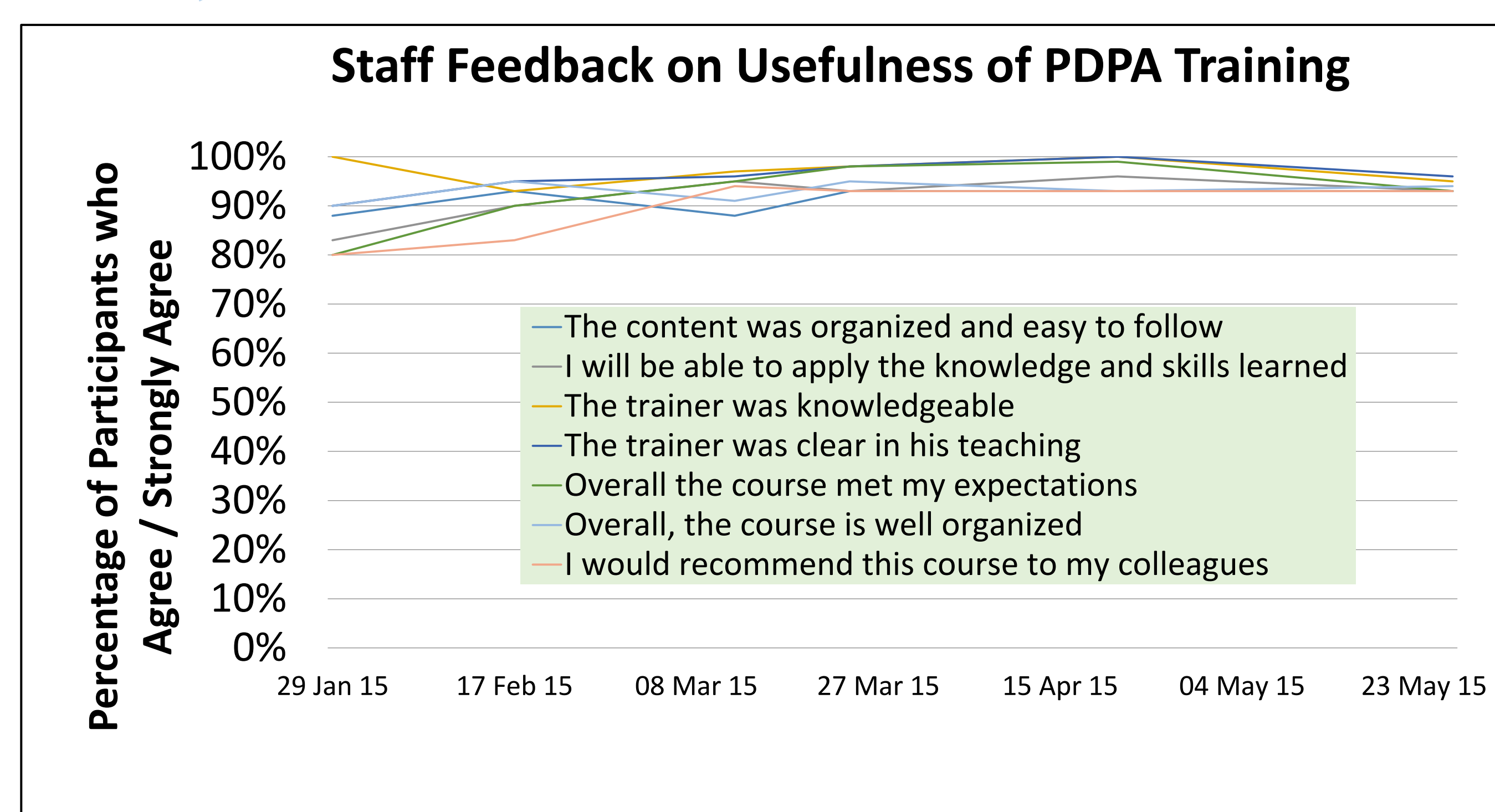
I am better prepared to answer patient's query.

The training raised my awareness of potential infringement of personal data privacy.

Helps me in how to handle patient data more carefully.

Period	Trainers	No. of Sessions	Trained Staff
Jun- Dec 2014	External Legal Advisor	23	3913
Jan- Jun 2015	In-house	9	729

Table 1: PDPA Training/Sharing sessions



Graph 2: Staff Feedback on In-house sessions

CONCLUSION

SingHealth PDPA Compliance has raised better awareness amongst SingHealth staff that protecting patient data is part of our care continuum. Individual institutions are better equipped to resolve PDPA matters through a collaborative approach by tapping onto collective experiences and knowledge sharing. This model will bide well for the coming compliance to the new Human Biomedical Research Bill expected to be enacted by end FY2015.