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**Applicability:** UNC Medical Center

## Retrieving Items from Locked Confidential Document Destruction Bins

### I. Description

To set forth the protocol for opening and retrieving items mistakenly discarded into locked confidential document destruction bins. This process should only be used in emergency situations and should not be implemented to retrieve documents that easily can be reproduced or to retrieve items of minimal value.

### II. Rationale

It is the policy of the University of North Carolina Health Care System (UNCHCS) that the locked confidential document destruction bins throughout UNC Hospitals and the School of Medicine remain locked in order to secure the privacy of patients' protected health information, as well as other confidential business, medical, and research information. At times, items may be mistakenly discarded, such that it is necessary to open one of the confidential document destruction bins. This policy shall set forth the protocol for opening these confidential document destruction bins.

### III. Policy

#### A. Procedure for Opening Confidential Document Destruction Bins Between the Hours of 7:00 AM and 11:30 PM

UNC Hospitals' Service Response Center (SRC) is open from 7:00 AM to 11:30 PM every day of the year. During these hours, the SRC will take all calls requesting a key to unlock a confidential document destruction bin. The procedure for obtaining such keys is as follows:

1. Any employee seeking to open a confidential document destruction bin must report his or her request to the area supervisor or manager where the bin is located.
2. The supervisor/manager (including a charge nurse) shall determine whether the employee's request to open a confidential document destruction bin is warranted and, if so, shall call 984-974-5611 and advise the SRC representative of the request.
3. SRC will record the name of the supervisor/manager requesting the key in a log maintained by SRC, along with the supervisor/manager's contact number. The supervisor/manager must report to the SRC to

retrieve the key.

4. The supervisor/manager retrieving the key from SRC must show his or her UNC Hospitals or UNC School of Medicine ID badge to the SRC representative. The SRC representative will record the Employee ID or University PID number in the log.
5. The supervisor/manager retrieving the key must sign the log and record the date and time he or she received the key.
6. The supervisor/manager retrieving the key also will record in the SRC log the item or document that was inadvertently dropped into the confidential document destruction bin.
7. The SRC representative will notify the supervisor/manager overseeing the retrieval that, upon returning the key, the supervisor/manager will be required to certify that two people were present when the bin was opened and to record the date and time the bin was opened and the item retrieved.
8. The supervisor/manager checking out the key must return the key to the SRC within one hour, at which time he or she again will sign the log, indicating the date and time the bin was opened, the item retrieved, and the date and time the key was returned. Additionally, by signing the log, the supervisor/manager will be certifying that at least two people were present when the bin was opened.
9. The SRC representative who signs the key out to the supervisor/manager is responsible for signing it back in. He or she also will record the relevant information into the log and will sign the log, certifying that all relevant information was recorded accurately. The SRC representative will place a reminder call in the event the key is not returned within one hour. After two hours, the unit manager/director will be notified of the potential breach of confidentiality, which may result in corrective action for the employee who failed to return the key.
10. The SRC Manager is responsible for maintaining the key logs for at least six years. The logs will be scanned and saved electronically after three months.

## **B. Procedure for Opening Confidential Document Destruction Bins Between the Hours of 11:30 PM and 7:00 AM**

Between the hours of 11:30 PM and 7:00 AM, when the SRC is closed, the third-shift Environmental Services Manager will handle opening the locked confidential document destruction bins.

1. Any employee seeking to open a confidential document destruction bin must report his or her request to the area supervisor or manager where the bin is located.
2. The supervisor/manager shall determine whether the employee's request to open a confidential document destruction bin is warranted and, if so, shall call the Environmental Services office at 984-974-9433, Vocera "EVS Manager, or the Environmental Services pager at 919-347-1967, to request that the manager or supervisor on duty come to the locked confidential document destruction bin to unlock it. The EVS supervisor and the unit supervisor/manager will complete the log with all of the retrieval information as outlined above in sections A.5, A.6, and A.7.

## **C. Off-Site Locations**

UNC Hospitals and UNC Faculty Physician clinics outside the UNC Hospitals campus will develop separate policies for the management of their confidential document destruction bins. At each of these locations, one

person must be responsible for maintaining keys to confidential document destruction bins and for maintaining a key log and controlling access to the keys and the bins. UNC Hospitals' Environmental Services managers will not be responsible for providing access to confidential recycling bins that are not located on the UNC Hospitals campus.

School of Medicine facilities should contact the School of Medicine Office of Information Systems, Information Security & Privacy Office.

**Attachments:**

No Attachments

**Applicability**

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UNC Medical Center

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