

County of Santa Clara
Santa Clara Valley Health and Hospital System
Surveillance Use Policy

Vocera Communication Technology

This Surveillance Use Policy is for the sole use of the Santa Clara Valley Health and Hospital System (SCVHHS).

1. Purpose

SCVHHS, at its Santa Clara Valley Medical Center (SCVMC), maintains and operates Vocera communication devices, currently provided under contract with Vocera Communications Inc., for purposes of enabling staff to communicate with each other at different locations throughout the hospital, which enables quick and timely communication among staff. For example, the janitorial service is notified if there is a patient bed that needs immediate cleaning. There are approximately 104 departments at SCVMC that use the system. No information shall be stored on the Vocera devices. A secure SCVHHS server shall maintain reports of all calls made and missed. The system has the capability to track and locate all persons using a Vocera device.

2. Authorized and Prohibited Uses

It shall be permissible for Vocera Communication Technology to be used for only the following purposes: for staff to communicate with each other in a quick and effective manner throughout the hospital. All interactions shall require a user to be logged in and authenticated, in order to operate a device on the system.

The Vocera equipment shall only be used in a legal manner, and for only County business purposes. It shall not be used for illegal purposes. It shall not be used to violate an individual's reasonable expectation of privacy, and shall not be used to harass, intimidate, or discriminate against any individual or group.

3. Data Collection

It shall be permissible for the Vocera system to collect the following information about individuals: a record of the time and location of every device, and the frequency of incoming and outgoing calls. Reports shall be generated for management containing overall recognition statistics (incoming and outgoing calls, record of the time and location of every device) by department and percentage of active users per department, for the purpose of monitoring the effectiveness of the system and to improve communication practices relating to providing healthcare services.

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4. Data Access

Access to data from the Vocera system shall be restricted to:

- Sheriff's Office personnel pursuant to MOU with SCVHHS providing for Sheriff's services and security at SCVHHS;
- Protective Services Office staff (SCVHHS security personnel);
- SCVHHS Director of Facilities or written designee;
- SCVHHS Director of Information Services Department or written designee;
- SCVHHS Department Heads or their written designees.

Efforts shall be made to keep the total number of designees with access to the data as low as possible within the constraints of this Policy.

5. Data Protection

All data generated by Vocera devices and system shall be accessible to only authorized staff members and configured to prevent unauthorized modification, duplication, or destruction of the recorded information.

In addition to password protection, the data shall be protected though secure, encrypted County servers.

6. Data Retention

No data shall be retained on the individual Vocera communication devices. It shall be permitted for data retained on the secure server, currently consisting of call records but no location data, to be retained for up to but no longer than three years.

7. Public Access

Members of the public shall not have direct access to Vocera data. Public requests for information relating to the Vocera devices (including information and reports from the secure server) shall be promptly submitted to the SCVHHS CPRA (California Public Records Act) Coordinator for handling. If a CPRA request, subpoena, or court order is issued for such data, the data shall be made public or deemed exempt from public disclosure pursuant to state or federal law, after consultation with the Office of the County Counsel as needed. Reasonable efforts shall be made to preserve the data requested until the request has been processed.

8. Third-Party Data-Sharing

It shall be permissible for data obtained regarding Vocera devices (including information and reports from the secure server) to be provided to law enforcement representatives outside SCVHHS if the SCVHHS Department Head or written designee reasonably believes that the information shows behavior or activity that appears to be unauthorized, illegal, or in furtherance of illegal activity.

Data may be requested by: an employee or an employee's representative regarding a specific claim, allegation, or action against the employee; or a third party seeking compliance with a court order or subpoena. In each of those circumstances, the request shall be reviewed by the SCVHHS Department Head with the assistance as appropriate by the Office of the County Counsel and the Labor Relations Department.

9. Training


Personnel involved in maintaining and using the Vocera devices shall be appropriately trained by SCVHHS Information Services and informed of the policies that affect their responsibility, including this Surveillance Use Policy. Training materials may be accessed on the HHS Connect Information Services page and the SCVHHS learning management system.

10. Oversight

SCVHHS Department Heads, security personnel, information services personnel, facilities management, and/or their written designee(s) shall oversee Vocera device technology to monitor compliance with this Surveillance Use Policy, designate in writing personnel who shall have access to the devices and the information gathered, and ensure that access to this information complies with authorized uses. SCVHHS Department Heads shall be responsible for ensuring that appropriate record-keeping processes are in place and followed by all staff when accessing these records.

Any employees found to have violated the Surveillance Use Policy shall be subject to possible discipline. Violations of this Surveillance Use Policy shall be reviewed by the SCVHHS Department Head and/or their designee(s) with the assistance of the Labor Relations Department and the Office of the County Counsel.

Approved as to Form and Legality

 12/31/19

Rob Coelho
Office of the County Counsel