



Unifying Dubai's Healthcare

Policies and Standards

September 2020 (v1.0)

SECTION 1: Subject of Care Rights

1. Purpose:

- 1.1. To inform the Subject of Care of their rights and role in the Nabidh platform.
- 1.2. To define Subject of Care expectations from NABIDH system.
- 1.3. To provide the Subject of Care the highest quality of care possible using NABIDH.
- 1.4. To encourage maximum number of participants in NABIDH program and allowing providers and government to continuously make improvements to the system of care.

2. Scope/Applicability

This policy applies to all healthcare facilities involved in the protection of Personal Health Information (PHI) including:

- 2.1. DHA and their Business Associates or any subcontractors, who is responsible for oversight of NABIDH platform.
- 2.2. NABIDH and their Business Associates or any subcontractors who is responsible for exchange of PHI.
- 2.3. Healthcare Facilities Their Business Associates or any subcontractors who is responsible for submission, collection and use of PHI.
- 2.4. Subject of Care or the Subject of Care Agent who is responsible for providing appropriate consent to their PHI.

3. Policy Statement:

3.1. Dubai Health Authority shall:

- 3.1.1. Oversee the implementation of policies, standards, and guidelines related to NABIDH participation as necessary in accordance with all Applicable Laws and DHA regulations.
- 3.1.2. Monitor on compliance with the NABIDH policies.

3.2. NABIDH Platform shall:

- 3.2.1. Maintain privacy and security protocols (physical, administrative, and technological) that are compliant with Applicable Laws.
- 3.2.2. Make all efforts to implement and maintain systems for Health Information Exchange that protect the integrity, security, privacy, and confidentiality of a Subject of Care's information.
- 3.2.3. Make information available to Subjects of Care regarding how their PHI could be used, who could have access to it, and under what circumstances it could be disclosed.
- 3.2.4. Make all efforts to assure identity of the Subject of Care is scrutinized in accordance with the NABIDH identity Management Policy for all Subject of Care accessible Health Information services.
- 3.2.5. Implement education programs to promote awareness on:
 - a. The value of the NABIDH.
 - b. How the NABIDH will operate.

- c. What information will or will not be available on the NABIDH.
 - d. NABIDH privacy and security protections.
 - e. How to participate in NABIDH and the Subject of Care rights.
 - f. Benefits and remedies afforded to Subject of Care.
- 3.2.6. Be responsible for Health service management and quality assurance.
- 3.2.7. Implement and publish NABIDH governance structure that shall be transparent.
- 3.2.8. Subject of care Health Information will be shared with Healthcare Facilities unless the Subject of Care opts out of the NABIDH or specific Healthcare Facilities.
- 3.3. All Healthcare Facilities shall:
- 3.3.1. Comply with relevant DHA regulatory requirements regarding subject of care rights and responsibilities.
 - 3.3.2. Make all efforts that each Subject of Care shall receive information at the Subject of Care's first visit following the provider's participation as a NABIDH Healthcare Facilities.
 - 3.3.3. Provide information to Subject of Care at least once (e.g. in the entrance of a care facility, on a facility website, or when providing an account to the consumer portal).

- 3.3.4. Provided information to Subject of Care should be concise, transparent, intelligible, easily accessible, and uses clear and plain language.
- 3.3.5. Provide information about the procedure to opt out from the NABIDH.
- 3.3.6. Provide informative materials to Subject of Care regarding NABIDH platform and materials should minimally include Information regarding:
 - a. Purpose of the Health Information exchange.
 - b. Benefits.
 - c. How Health Information are protected.
 - d. How Health Information can be used.
 - e. Retention period of Health Information.
 - f. Contact information to the NABIDH to obtain more information.
- 3.3.7. Make information available to Subjects of Care regarding how their Health Information could be used, who could have access to it, and under what circumstances it could be disclosed.
- 3.3.8. Provide significant education program so that individuals understand how the NABIDH will operate, what information will or will not be available on the NABIDH, the value of the NABIDH, its privacy and security protections, how to participate in the exchange and the rights, benefits and remedies afforded to them and how to access subject of care portal.

3.4. The Subject of Care or the Subject of Care Agent shall:

- 3.4.1. Be able to access their relevant PHI contained within the NABIDH in a readable form and format including an electronic format.
- 3.4.2. Subject of care Health Information should be available to the Subject of Care conveniently.
- 3.4.3. Subject of care Health Information shall be available to the Subject of Care affordably.
- 3.4.4. The Subject of Care shall have provision to upload clinical/ laboratory documents into NABIDH through portal for the treatment received from other healthcare providers outside Emirate of Dubai and UAE.
- 3.4.5. Subject of Care shall be responsible for uploading the correct clinical/laboratory documents and information on the portal for the treatment received from other healthcare providers outside Emirate of Dubai and UAE.
- 3.4.6. Subjects of care should have a means of direct, secure access to their relevant PHI that does not require physician or institutional mediation (Example: Through Subject of care Portal or through other approved services).
- 3.4.7. Subjects of Care shall be able to supplement their PHI without fees or burdensome processes.
- 3.4.8. Rights and process for complaints if the Subject of Care suspects a breach should be clear. Refer to complaints process in reference section of this manual.
- 3.4.9. In the case of a suspected breach, the Subject of Care that is the data subject of such a breach may request an investigation (refer to Breach Notification Policy). Such a request shall be issued by the

Subject of Care or by the authorized Subject of Care agent; should the Subject of Care be unable to do so.

- 3.4.10. Such requests shall be directed to the Data Privacy and Security Officer / Health Information Management Personnel within the suspected Healthcare Facility and NABIDH designated team.
- 3.4.11. In the case of a breach identified and investigated through the NABIDH, the Subject of Care that is the data subject of such a breach will be notified.
- 3.4.12. Subject of Care should have the right to request a report of electronic disclosures for information accessed through the NABIDH where the Subject of Care is the data subject.
- 3.4.13. Such a request shall be issued by the Subject of Care or by the authorized Subject of Care agent should the Subject of Care be unable to do so,
- 3.4.14. The request shall be directed to the local Data Privacy and Security Officer, HISHD, or NABIDH designated team.
- 3.4.15. Report of electronic disclosures shall include information such as:
 - a. Date of disclosure.
 - b. Name of the Healthcare facility or person that received the disclosure.
 - c. Name of the Healthcare facility or person that made the disclosure.
- 3.4.16. The Subject of Care should be provided notification of break-glass accesses to his/her Subject of care Health Information through appropriate means such as email, cell phone etc.
- 3.4.17. The Subject of Care may choose to opt out of the NABIDH. In order to exercise this option, the Subject of Care shall follow the op out

procedure provided by Healthcare Facility. Procedures and instructions for how to opt out of the NABIDH shall be provided to the Subject of Care or to the authorized Subject of Care agent should the Subject of Care be unable to review or comprehend the instructions.

3.4.18. All opt out requests shall be issued by the Subject of Care or by the authorized Subject of Care agent in the event that the Subject of Care is unable to do so. The healthcare provider may process the request on behalf of the Subject of Care.

3.4.19. The Subject of Care may choose to opt back in to the NABIDH at any time as per NABIDH process.

Contact Us

Still have questions?

For more information on NABIDH, please reach out through the following channels:



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