



Privacy Policy

Protection of Personal Health Information

Cardiac Care Network of Ontario (CCN)

Principles and Policies

September 2008

For questions concerning this Policy please contact:

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INTRODUCTION

The Cardiac Care Network of Ontario (CCN) is an advisory body to the Ministry of Health and Long-Term Care that is dedicated to improving the quality, efficiency, access and equity in the delivery of cardiac care services in the Province of Ontario. CCN is also a prescribed person within the meaning of section 39(1)(c) of the *Personal Health Information Protection Act, 2004* in respect of its registry of cardiac services.

CCN maintains a registry of cardiac services for purposes of facilitating and improving the provision of cardiac care services in the Province of Ontario. Information about the registry is publicly available on the CCN website at www.ccn.on.ca.

As a prescribed person within the meaning of the *Personal Health Information Protection Act, 2004*, CCN is permitted to collect personal health information without consent for the purposes of facilitating or improving the provision of cardiac care services, but it may only use and disclose that personal health information as permitted by the *Personal Health Information Protection Act, 2004*. In particular, CCN uses personal health information in its registry of cardiac services to monitor and manage the health status of patients who are waiting to access advanced cardiac services and for service evaluation and planning to improve the provision of cardiac services in the province.

As a prescribed person, CCN must implement practices and procedures to protect the privacy of individuals whose personal health information it receives and to maintain the confidentiality of that information. These practices and procedures must be reviewed by the Information and Privacy Commissioner/Ontario every three years.

POLICY STATEMENT:

Principle 1 - Accountability for Personal Health Information

The Chief Executive Officer of the Cardiac Care Network of Ontario is ultimately accountable for the protection of personal health information in the custody or control of the Cardiac Care Network of Ontario (CCN) but has delegated day to day responsibility for ensuring that personal health information is collected, used and disclosed in accordance with its privacy policies and procedures and in compliance with the *Personal Health Information Protection Act, 2004*, to the Privacy Officer. The Privacy Officer of CCN is the Director of Operations and Stakeholder Relations.

In addition to the development and implementation of privacy and security policies and procedures and the annual provision of privacy and security training, CCN uses contractual means to ensure that personal health information in its custody or control is collected, used and disclosed in accordance with the *Personal Health Information Protection Act, 2004* and is protected from theft, loss and unauthorized use or disclosure. In particular, CCN requires employees, consultants, volunteers and members of the Board of Directors to sign Confidentiality Agreements that clearly describe their obligations with respect to protecting the confidentiality of personal health information and protecting the privacy of individuals with respect to that information. CCN further requires consultants, contractors and vendors to sign agreements outlining their obligations to protect personal health information.

CCN is responsible for personal health information under its custody or control. Hospitals that provide personal health information to CCN pursuant to Participant Agreements are responsible for the personal health information that they collect and CCN is responsible for personal health information received from member hospitals.

POLICY STATEMENT:

Principle 2 - Identifying Purposes for Collecting Personal Health Information

The Cardiac Care Network of Ontario (CCN), via front-line healthcare providers, will identify the purposes for which personal health information is collected proximate to the time that the personal health information is collected. Each patient registered in the registry of cardiac services compiled and maintained by CCN will be provided with an information brochure specifying the purposes for which personal health information is being collected and this information brochure will also be made available on the CCN website, www.ccn.on.ca. In addition, posters identifying the information practices of CCN are posted in the cardiac areas of the hospitals from which CCN collects personal health information.

CCN uses identifiable health information to maintain waiting lists for treatment and to assist in the management and planning of the delivery of cardiac care services from a provincial perspective through the production of statistics and the facilitation of applied health services research.

The types of personal health information collected include:

- Patient name, middle name and surname
- Patient date of birth
- Patient sex
- Patient OHIP number
- Patient chart and/or medical record numbers
- Medical report numbers and/or specimen accession numbers
- Patient address, city/town, province, and postal code, telephone number
- Patient telephone numbers

POLICY STATEMENT:

Principle 3 – Notice/Consent for Collecting, Using, or Disclosing Personal Health Information

The Cardiac Care Network of Ontario (CCN), via its member hospitals from which personal health information is collected, provides notice to patients about its collection, use and disclosure of personal health information through the use of a patient brochure. The brochure is provided to each patient registered in the registry of cardiac services compiled and maintained by CCN and is made available on the CCN website, www.ccn.on.ca.

In addition, posters identifying the information practices of CCN are posted in the cardiac areas of the hospitals from which CCN collects personal health information.

As a prescribed person within the meaning subsection 39(1)(c) of the *Personal Health Information Protection Act, 2004*, CCN is permitted to collect personal health information without consent for purposes of facilitating or improving the provision of cardiac care services and to use personal health information without consent for these purposes, including to maintain wait lists for treatment and to assist in the management and planning of the delivery of cardiac care services. CCN is also permitted to use and disclose this personal health information without consent where permitted by the *Personal Health Information Protection Act, 2004*.

CCN acknowledges however, that patients in its registry of cardiac services are entitled to receive information to allow them to understand the purpose of the registry, including information to help them understand how the registry assists in facilitating their care.

POLICY STATEMENT:

Principle 4 – Limiting Collection of Personal Health Information

The Cardiac Care Network of Ontario (CCN) will limit the collection of personal health information to that which is necessary for the purposes it has identified. CCN will collect personal health information by fair and lawful means.

POLICY STATEMENT:

Principle 5 – Limiting Use, Disclosure, and Retention of Personal Health Information

The Cardiac Care Network of Ontario (CCN) only uses and discloses personal health information for purposes of facilitating or improving the quality and provision of cardiac care services, namely to maintain wait lists for cardiac care services and to assist in the management and planning of the delivery of cardiac care services in the Province of Ontario, and as permitted or required by law, including the *Personal Health Information Protection Act, 2004*.

CCN only permits employees, consultants, contractors and volunteers to access and use personal health information on a “need to know” basis when access is required in the performance of their employment, contractual or other relationship with CCN.

Personal health information is retained by CCN for only as long as is necessary for the fulfillment of the above noted purposes. Currently, personal health information is being retained permanently for long-term analysis and statistical information.

Personal health information that is no longer required for the identified purposes is destroyed in a secure manner to ensure that reconstruction is not reasonably foreseeable in the circumstances.

POLICY STATEMENT:

Principle 6 – Accuracy of Personal Health Information

Personal Health Information will be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used. Data quality audits are routinely performed. CCN's wait list data are verified on a monthly basis.

POLICY STATEMENT:

Principle 7 – Safeguards for Personal Health Information

The Cardiac Care Network of Ontario (CCN) protects personal health information through administrative, physical and technical safeguards.

Administrative safeguards include:

- The development and implementation of privacy and security policies and procedures;
- Annual privacy and security training;
- Requiring employees, consultants, volunteers and members of the Board of Directors to sign Confidentiality Agreements that clearly describe their obligations with respect to protecting the privacy of individuals with respect to that information;
- Requiring consultants, contractors and vendors to sign agreements outlining their obligations to protect personal health information; and
- Requiring Participation Agreements to be executed prior to the collection of personal health information from member hospitals.

Physical safeguards include:

- CCN is located in a locked facility with external video monitoring;
- Tracked card access which divides the facility into varying levels of security with each successive level being more secure and restricted to fewer individuals; and
- Access to the server room requires that individuals successfully pass through multiple levels of security.

Technical safeguards include:

- The use of firewalls, network encryption and intrusion detection systems.

POLICY STATEMENT:

Principle 8 – Openness about Information Handling Policies and Practices

The Cardiac Care Network Ontario (CCN) will provide information about its policies and practices relating to the management of personal health information through its website.

Each individual in its registry of cardiac services is provided with an information brochure by the cardiac centre setting out the purposes for which personal health information is being collected and used by CCN. Furthermore, CCN has developed posters that are posted in the cardiac areas of hospitals identifying its information practices.

POLICY STATEMENT:

Principle 9 – Individual Access to Personal Health Information

Upon written request an individual will be informed of the existence, use, and disclosure of his or her personal health information.

In particular, upon request, CCN will inform an individual whether or not it holds personal health information about the individual and will seek to indicate the source of this personal information. In addition, CCN will provide, to the extent possible, an account of the use that has been made or is being made of this personal health information and an account of the third parties to which the personal health information has been disclosed, if any.

POLICY STATEMENT:

Principle 10 – Challenging Compliance with Privacy Policy

An individual will be able to challenge compliance with privacy policies to the designated individual or individuals at Cardiac Care Network of Ontario (CCN). The designated Privacy Officer for CCN is the Director of Operations and Stakeholder Relations; in this person's absence, challenge/enquiry should be directed to the Director of Quality and Performance. The Chief Executive Officer, or the designated manager, will handle enquiries/challenges in the absence of the Director of Operations and Stakeholder Relations and the Director of Quality and Performance.

All challenges should be directed to CCN's Privacy Officer, where the challenge is documented and investigated further, and appropriately referred onwards, if appropriate.

Contact Information for CCN Privacy Officer:

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