



Privacy Impact Assessment Summary

Date: 01/20/2017

CCO Ontario Breast Screening Program Correspondence Phase II: Invitation-Reminders, Recalls, Recall-Reminders and Normal Results

As required by the Information and Privacy Commissioner of Ontario and by Cancer Care Ontario's (CCO) Privacy Policy, a Privacy Impact Assessment (PIA) Addendum was completed for the CCO Ontario Breast Screening Program (OBSP) Correspondence Phase II initiative.

The following is a summary of the PIA Addendum and includes background on the OBSP Correspondence Phase II. The summary also notes CCO's progress in implementing the recommendations contained in the PIA addendum.

Background

The purpose of the OBSP is to decrease mortality from breast cancer by increasing the number of women getting screened regularly and receiving appropriate follow-up so that cancers are diagnosed early when treatment is more successful. The objective of OBSP Correspondence Phase II is to send the following types of breast cancer screening correspondence to eligible participants in Ontario: invitation-reminders, recalls, recall-reminders and normal results. The OBSP correspondence includes personal health information (PHI) that CCO has collected from OBSP health care providers.

Privacy Impact Assessment

This PIA Addendum concludes that CCO has the authority to carry out the operations of OBSP Correspondence Phase II as a Prescribed Person pursuant to the Ontario Personal Health Information Protection Act, 2004 (PHIPA) and its regulation (O. Reg. 329/04) and, as an alternative authority, the Ontario Freedom of Information and Protection of Privacy Act (FIPPA).

This PIA Addendum identifies 10 privacy risks and recommends certain actions be taken by CCO to manage these risks. The outstanding risks and related recommendations are summarized in Part III of the PIA Addendum.

Privacy Impact Assessment Recommendations

In summary, the following are recommendations from the OBSP Correspondence Phase II PIA Addendum:



- CCO must identify and document the data elements which are reasonably necessary for its operation of the OBSP as a Prescribed Person.
- CCO should ensure that the PHI data elements that have been identified as necessary for the operation of the OBSP as a Prescribed Person, are managed by CCO in a distinct and separate data holding.
- CCO has executed agreements with hospitals that identify the PHI that CCO is collected as a Prescribed Person for the operation of the OBSP. CCO should update the list of data elements to include those elements that have been identified as necessary for the operation of the OBSP Correspondence.

CCO is currently in the process of implementing the recommendations made in OBSP Correspondence Phase II PIA Addendum.

Please contact the Legal & Privacy Office should you have any questions.

Legal and Privacy Office

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