



Privacy Impact Assessment Summary: Integrated Cancer Management System

As required by the Information and Privacy Commissioner of Ontario and by Cancer Care Ontario's (CCO) Privacy Policy, CCO commissioned a privacy impact assessment (PIA) on the Ontario Breast Screening Program's (OBSP) Integrated Cancer Management System (ICMS). The flow of personal health information (PHI) as it traverses through ICMS and the business processes were documented and assessed to ensure legislative compliance from a privacy best practice perspective.

The following is a summary of the PIA, including a brief background on the OBSP, key findings, and CCO's progress in implementing the recommendations.

Background

The OBSP is a CCO Ministry of Health and Long-Term Care initiative for the delivery of high quality breast screening to Ontario women. The OBSP cancer screening services are delivered to women age 50 and over at dedicated sites, affiliated hospitals and independent health facilities.


To support the operation of the OBSP, CCO established the ICMS. This application and its database are controlled and operated by CCO and provided to screening sites for client registration, follow-up and case management. In addition, CCO employs the information submitted via the ICMS for the purpose of cancer system planning and management (for example, reporting on wait times for breast assessments).

This PIA assesses ICMS as an application provided by CCO to OBSP sites to assist in the operation of the OBSP program. CCO's collection and use and disclosure of personal health information (PHI) the purpose of operating the OBSP in its role as PHIPA section 39 (1)(c) prescribed person and for health system planning as a PHIPA section 45 prescribed entity was assessed in the OBSP Privacy Impact Assessment conducted in March 2015.

Legislative Authority

The PIA found that CCO has the authority under PHIPA O. Reg. 329/04 s. 6(2) to operate ICMS as a Health Information Network provider.

The PIA recommends several measures to ensure that the operation of the OBSP and ICMS comply with CCO policies and procedures, and recognized standards of privacy best practice. Key PIA recommendations related to the clarification of accountability when sharing personal health information through ICMS; the elaboration of information management practices and procedures; the communication of these standards, practices and



procedures to sites; and implementation of minor technical fixes to the ICMS were met by CCO via IT solutions, policies and procedures, and communications to sites. Since drafting the PIA, all recommendations have been addressed.

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

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