

Privacy Impact Assessment Summary

Date: 01/20/2017

Specialized Services Oversight Information System-Interventional Radiology

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 Specialized Services Oversight Information System (**SSO IS**) Interventional Radiology initiative.

The following is a summary of the PIA Addendum and includes background on the SSO IS Interventional Radiology initiative and key findings of the PIA Addendum. The summary also notes CCO's progress in implementing the recommendations contained in the PIA Addendum.

Background

The SSO IS is used by hospitals as a secure method to submit patient information, including personal health information (**PHI**) to CCO with respect to specialized cancer services. CCO uses this information for reporting and analytical purposes, including program development, planning, volume funding and performance management. These activities help CCO to ensure Ontarians have appropriate access to specialized cancer services.

Currently, CCO collects PHI through SSO-IS on 6 specialized cancer services. Through this initiative, the scope of SSO-IS will expand to collect new PHI, which is related to an additional specialized cancer service, interventional radiology. The new PHI to be collected under this initiative is necessary for CCO to understand service demand, requirements of high quality service delivery, and availability/distribution of resources to formulate appropriate recommendations and monitor performance of interventional radiology services.

Privacy Impact Assessment

As described in detail in the SSO PIA, CCO maintains the authority as a prescribed entity to collect PHI from health information custodians (HICs) pursuant to section (s.) 18(1) of Ontario Regulation (O. Reg.) 329/04 of the *Personal Health Information Protection Act* (PHIPA). As a prescribed entity, CCO may collect and use this PHI for the purposes of s. 45 of PHIPA, which relates to health system planning and management. The SSO IS Interventional Radiology PIA Addendum concluded that CCO is collecting and using interventional radiology PHI, in CCO's role as a prescribed entity.



The PIA addendum identifies one risk related to the privacy review of any anticipated linkages of interventional radiology PHI with other data holdings that are under the custody and control of CCO. This risk is described in the Privacy Analysis of the Collection, Use and Disclosure section of the SSO IS Interventional Radiology PIA Addendum.

Privacy Impact Assessment Recommendations

In summary, the SSO IS Interventional Radiology PIA Addendum recommends that a privacy review be conducted on the anticipated linkages of interventional radiology PHI with other CCO data holdings, prior to the linkages occurring. This recommendation has since been implemented and there are no outstanding recommendations from the SSO IS Interventional Radiology PIA Addendum.

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

Legal and Privacy Office

Cancer Care Ontario 620 University Avenue Toronto, ON M5G 2L7

Email: legalandprivacyoffice@cancercare.on.ca

Tel: 416-217-1816