

INTERPRETERCONNECT

PRIVACY IMPACT ASSESSMENT (PIA)

WHY DO I NEED A PIA?

A PIA is required if there are significant changes proposed to an existing information system, technologies or programs or implementing a new system, technologies or programs where Personal Health Information (PHI) will be stored.

PHI is any identifying information about an individual that relates to their physical or mental health. Examples of PHI could include patient name, address, postal code, health care number.

WHAT WILL THE PIA ACCOMPLISH?

A PIA is a formal risk management tool that will be used to identify the actual or potential effects that a proposed or existing information system, technology or program may have on individuals' privacy. A PIA intends to identify areas of issue with privacy. Solutions are not provided within the PIA, rather, the PIA serves to provide areas of **privacy risk** which may need to be addressed prior to the implementation of the system, technology or program.

COMPLETED PIA QUESTIONNAIRE

QUESTION	YES	IN PROGRESS	NO	ATTACHED	REFERENCE
Has a summary of the proposed or existing information system, technology or program been prepared, including a description of the requirements for the system, technology or program and a description of how the information system, technology or program will or does meet those needs?	X				
Note:					
Will this system, technology or program share personal health information with any other systems or databases? If so, how?			X		
Note:					

QUESTION	YES	IN PROGRESS	NO	ATTACHED	REFERENCE
Is the collection of personal health information limited to what is necessary for the intended purpose?	X				
Note:					
Has an assessment been completed to identify potential risks to the privacy of individuals whose personal health information is collected, used, retained or disclosed by the proposed or existing information system, technology or program?	X				
Note:					
If potential risks to privacy have been identified, what steps have been taken to minimize or eliminate those risks?	X				
Note: Our call centre has put controls in place to ensure privacy.					
Is there a protocol for responding to potential privacy breaches, including notification procedures for affected individuals and reporting obligations to regulatory bodies?	X				
Note:					
Will vendors or external users receive training on PHIPA privacy requirements and be made aware of the relevant notification procedures if personal health information is stolen, lost or accessed by unauthorized persons?	X				
Note:					
Are there privacy policies in place for this system? (if so, please attach). Do they include: <ul style="list-style-type: none"> • Compliance with PHIPA and other privacy laws?; 	X			X	

QUESTION	YES	IN PROGRESS	NO	ATTACHED	REFERENCE
<ul style="list-style-type: none"> • A plan for record secure storage, retention and disposal outlining the minimum and maximum lengths of time personal health information to be retained?; • Contact details for the Privacy Office in case of a privacy breach?; • Steps to handle and report privacy breaches? 					
Note:					
Does the system deploy access controls and keep track of who accesses, modifies, or shares personal health information? Can it generate audit logs to detect unauthorized activity?	X				
Note: Our call centre does not modify or share information.					
Are there clear policies and procedures in place to ensure ongoing compliance with privacy rules and the commitments made in this PIA?	X				
Note:					