

Privacy Impact Assessment Summary

Date Originally Written: 22 June 2011

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Privacy Impact Assessment – Call Centre Technologies

A Privacy Impact Assessment (PIA) is a risk management tool that allows the Ontario Telemedicine Network (OTN) in its role as a Health Information Network Provider under the *'Personal Health Information Protections Act, 2004'*¹ to assess a technology, program or information system's privacy risks and its compliance with provincial and federal legislative requirements and standards. Where required, a PIA also details mitigating strategies by way of recommendations and an action plan. A critical element of the PIA process is the implementation of those recommendations detailed in the assessment.

A PIA has the benefit of generating and communicating confidence that privacy requirements have, or are being, met and risks mitigated. A PIA is meant to be used and expanded over the cycle of the initiative's development and implementation. PIA's are refreshed over time to continuously identify and address risks that have the potential to impact the confidentiality, integrity and accessibility of personal health information held/handled by OTN and/or its partners. OTN has adopted a risk tolerance level of low, meaning that low and very low risks will not be immediately actioned, but will be monitored to ensure that they stay within tolerable levels. All high and medium risks are mitigated.

Contact centres are becoming the primary interface between business and service delivery organizations and their customers. OTN completed a PIA on its Call Centre Technologies in July 2010. The following is a summary of the PIA findings, including a brief background on OTN's Call Centre Services, risks, risk mitigation recommendations, and contact information.

Background

Contact centre technologies include any electronic method for communicating with customers. In the case of OTN, our customers include health care providers, OTN member sites, and in some cases, patients who access health care services through telemedicine.

Ontario Telemedicine Network (OTN) is a highly decentralized operation with contact centre personnel located in several locations across Ontario. OTN recognizes that in order to maintain quality service to its clients, we must upgrade our technology and monitoring processes to conform to industry best practices for contact centre management. These Call Centre Technologies provide OTN with an

Source: 1 Ontario Ministry of Health and Long-term Care. "Health Information Protection Act, 2004."
http://www.health.gov.on.ca/english/providers/legislation/priv_legislation/priv_legislation.html.

effective way to measure performance, evaluate business processes, ensure compliance and improve service delivery and customer satisfaction. Toward that end, OTN has adopted call recording and email management technologies as part of its approach to quality Call Centre management.

Key Findings/Risks & Recommendations

The PIA identified some privacy controls that should be enhanced to support the program. OTN has already closed all of the recommendations.

The PIA makes the following recommendations:

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
1	Medium	Inadvertent, Excessive or Unauthorized Collection of PHI	<ul style="list-style-type: none"> Expand privacy monitoring to include the use of call recordings: OTN currently has a privacy and security monitoring program in place, but at present this program does not extend to the contact centre technologies. OTN's privacy specialists should periodically audit access logs, particularly from the call recording software. Obtain patient consent prior to call recording Amend Privacy Policy to include quality management as an identified purpose: To satisfy the openness principle, OTN should be clear that quality management is an essential component of providing services to HICs. 	All Complete

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
			<ul style="list-style-type: none"> Amend member agreements to include quality management as an identified purpose for the information collected Establish defined retention period for call recordings Enhanced privacy training for universal agents and team leads 	
2	Medium	Unauthorized Disclosure of PHI via Unauthorized Access/Hacking of email or phone recordings	<ul style="list-style-type: none"> Expand privacy monitoring to include the use of call recordings Address threats, vulnerabilities and risks identified in the TRA Establish defined retention period for call recordings Feasibility Study for Secure Email: Before transmitting PHI by email, OTN should undertake a comprehensive feasibility study to determine options for secure email. 	All Complete
3	Medium	Unauthorized Disclosure of PHI by Contact Centre Agents	<ul style="list-style-type: none"> Enhanced privacy training for universal agents and team leads Expand privacy monitoring to include the use of call recordings Address threats, 	All Complete

#	RATING	FINDING/RISK	RECOMMENDATION	STATUS
			vulnerabilities <ul style="list-style-type: none"> • Establish defined retention period for call recordings • Feasibility Study for Secure Email 	
4	High	Denial of Patient Rights: Collection, use or disclosure of PHI without appropriate notification or consent		Complete

Please contact the OTN Privacy Office should you have any questions:

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