

Privacy Impact Assessment Summary

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Privacy Impact Assessment – TSM/Ncompass

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.

OTN completed a PIA on TSM/Ncompass (OTN's scheduling software) in July 2010. The following is a summary of the PIA, including a brief background on TSM/Ncompass, key findings & recommendations, and contact information.

Background

Ontario Telemedicine Network (OTN) has a primary scheduling software with two user interfaces by which videoconferencing sessions between participating member sites are booked and managed. Telemedicine Service Manager (TSM) and the Ncompass (member facing) self-scheduling application are the two different user interfaces.

TSM and Ncompass users that are booking a clinical event may require support from OTN Customer Care in order to complete their event booking. If the user is in need of assistance they can open the template email, complete the required information and send the email to the OTN Customer Care department. The collection of information about the nature of the assistance requested cuts down on the number of emails between the requestor and OTN Customer Care, thereby allowing for a more efficient response to the user and scheduling of their event.

Key Findings/Risks & Recommendations

The PIA identified some privacy controls that should be enhanced to support the program. OTN has already closed some of the recommendations and has plans in place to address others in the coming months. In the interim, we have put temporary risk mitigation plans in place where required.

The PIA makes the following recommendations:

#	RATING	FINDING/RISK	RECOMMENDATION(S)	STATUS
TSM 02	High	External TSM Users	Conduct audits to monitor user access to TSM by outside parties (training and agreements)	Complete
TSM 11	Medium	TSM Training	Create training program (All TSM users and those at member sites)	Complete

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

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