

TITLE

PRIVACY IMPACT ASSESSMENTSSCOPE

Provincial

DOCUMENT

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Corporate Services Executive Committee

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SPONSOR

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Not applicable

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NOTE: The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the Definitions section.

If you have any questions or comments regarding the information in this document, please contact the Policy & Forms Department at policy@ahs.ca. The Policy & Forms website is the official source of current approved policies, procedures, directives, standards, protocols and guidelines.

OBJECTIVES

- To set out the criteria, responsibility, and process for conducting **Privacy Impact Assessments** (PIA) within Alberta Health Services (AHS).
- To ensure that AHS completes risk assessments to measure the impact of a new project on privacy.
- To support the expected InfoCare behaviours of **AHS people** when handling information and to meet AHS' legal obligations as a public body holding **personal information** and as a custodian of **health information**.

PRINCIPLES

AHS is committed to ensuring that new or changed practices and systems implemented within the organization are assessed for any potential impacts on individual privacy and for compliance with the *Health Information Act* (Alberta) (HIA) and the *Freedom of Information and Protection of Privacy Act* (Alberta) (FOIP). The PIA process implemented by AHS provides documented assurance to AHS, the Office of the Information and Privacy Commissioner (OIPC) as required, and the public that privacy issues related to personal information and health information in the custody and control of AHS has been appropriately identified and addressed.

AHS shall conduct PIA reviews, risk assessments, and audits to ensure that AHS' PIA processes are consistent, effective, accurate, appropriately reviewed and updated, and in compliance with applicable legislation and regulations.

APPLICABILITY

Compliance with this document is required by all Alberta Health Services employees, members of the medical and midwifery staffs, Students, Volunteers, and other persons acting on behalf of Alberta Health Services (including contracted service providers as necessary).

ELEMENTS

1. Criteria

- 1.1 AHS shall conduct PIAs as required by the HIA for initiatives, which may include but is not limited to:
- a) the collection, use, or disclosure of new health information that was not previously collected, used, or disclosed;
 - b) granting new parties access to health information;
 - c) implementation of new service delivery or management technologies that store, transmit, or retrieve health information;
 - d) implementation of new or different electronic health record systems, or changes to existing systems;
 - e) entering into agreements with new business partners or vendors who will have access to health information in the custody or control of AHS;
 - f) establishing a new health care delivery models;
 - g) establishment of new program groups that will collect, use, or disclose health information;
 - h) introduction of new or revised administrative practices or information systems relating to the collection, use, or disclosure of individually identifying health information;
 - i) implementation of new health information repositories;
 - j) **data matching** of health information in the custody or control of AHS with data from another custodian or from a non-custodian; or
 - k) establishment of repositories that facilitate future research studies.
- 1.2 Departments shall consult the Information & Privacy Department with regard to determining whether PIAs are required for initiatives.
- 1.3 The Information & Privacy Department shall address the requirement, through established risk management processes, to conduct PIAs containing personal information and no health information.

2. Responsibilities and Process

- 2.1 AHS **repository owners** shall conduct PIAs, where required, that describe how proposed administrative practices and information systems pertaining to the collection, use, and disclosure of individually identifying health information may impact the privacy of the individuals who are the subject of the information.
- 2.2 Where PIAs are required, repository owners, or designates shall:
- a) prepare draft PIA documents;
 - b) complete risk assessments prior to implementation of new projects to allow adequate time for review of the impact on privacy and security;
 - c) work with the Information & Privacy Department to ensure that PIAs are submitted to OIPC before proposed administrative practices or systems, or changes to systems or practices are implemented;
 - d) sign the PIA upon satisfactory completion of the reviews;
 - e) in conjunction with the Information & Privacy Department, respond to and resolve matters raised by the OIPC;
 - f) review their PIAs annually and update as necessary;
 - g) fulfill all commitments made in a PIA;
 - h) update PIAs periodically as program changes are considered; and
 - i) notify the Information & Privacy Department of any amendments to a PIA.
- 2.3 The Information & Privacy Department shall:
- a) determine whether a PIA is required;
 - b) develop and publish processes and tools for conducting and documenting PIAs;
 - c) approve and submit PIAs to the OIPC for review upon timely receipt of the PIAs from repository owners;
 - d) retain, in accordance with the *Records Retention Schedule*, copies of PIA and documentation which address the OIPC's concerns;
 - e) review and submit any amendments to PIAs to the OIPC; and
 - f) support repository owners in meeting their responsibilities.

DEFINITIONS

AHS people means Alberta Health Services employees, members of the medical and midwifery staffs, Students, Volunteers, and other persons acting on behalf of AHS (including contracted service providers as necessary).

Data matching means the creation of individually identifying health information by combining health information, whether identifiable or non-identifiable, from two or more sources without the consent of the individual who is the subject of the information.

Health information means one or both of the following:

- a) diagnostic, treatment and care information; and
- b) registration information (e.g., demographics, residency, health services eligibility, or billing).

Personal information means recorded information, not governed by the *Health Information Act* (Alberta), of any kind stored in any format that identifies an individual including, but not limited to:

- a) address and contact information (including an identifying number or symbol assigned to an individual);
- b) race, ethnic origin, gender, or marital status;
- c) educational, financial, employment, or criminal history;
- d) opinions of others about the person;
- e) the image of a person on a photograph; and
- f) personal views and opinions of a person (except if these are about another person).

Privacy Impact Assessment means a documented process to assist AHS in reviewing the impact new projects might have on individual privacy.

Repository owner means the individual(s) responsible for defining the processes and controls for the assessment, storage, security, privacy, and disposition of the information in a repository.

REFERENCES

- Alberta Health Services Governance Documents:
 - *Collection, Access, Use, and Disclosure of Information Policy* (#1112)
 - *Information Security and Privacy Safeguards Policy* (#1143)
 - *Privacy Protection and Information Access Policy* (#1177)
 - *Records Retention Schedule* (#1133-01)
- *Research Information Management Policy* (#1146) Alberta Health Services Forms:
 - *Privacy Impact Assessment Compliance Questionnaire*
 - *Privacy Impact Assessment Intake Questionnaire*
 - *Privacy Impact Assessment Registry*
- Alberta Health Services Resources:
 - Access & Disclosure (Health Information Management): disclosure@ahs.ca
 - Information and Privacy: privacy@ahs.ca

- Whistleblower Line (Confidential): 1-800-661-9675
- Non-Alberta Health Services Documents:
 - *Freedom of Information and Protection of Privacy Act* (Alberta)
 - *Health Information Act* (Alberta)

VERSION HISTORY

Date	Action Taken
October 16, 2019	Revised
Click here to enter a date	Optional: Choose an item