



Team Name: Health Information Services Team Lead: Regional Privacy & Access Officer Approved by: VP - Corporate Services	Reference Number: ORG.1411.PL.301 Program Area: Health Information Services Policy Section: Privacy & Access
Issue Date: January 12, 2017 Review Date: Revision Date:	Subject: Completion of a Privacy Impact Assessment (PIA)

POLICY SUBJECT:

Completion of a Privacy Impact Assessment (PIA).

PURPOSE:

To identify and assess the safeguards required and risks associated with the electronic collection, storage, use and disclosure of identifiable personal health information and/or identifiable personal information.

BOARD POLICY REFERENCE:

Executive Limitation (EL-2) – Treatment of Clients

POLICY:

1. A PIA shall be conducted in conjunction with the following:
 - Initiation, planning/design, development and implementation of a new electronic information system and/or database initiative, including but not restricted to databases developed in Access, Excel, etc.
 - Prior to implementing modifications to an existing electronic information system and/or database that may contain identifiable personal health information and/or identifiable personal information. These modifications include but are not restricted to the implementation of new or upgraded software and/or an expansion or changes to the data collected, used or disclosed.
 - To assess compliance with statutory requirements and best practice for existing information systems/databases.
 - For electronic information systems/database initiatives for which Southern Health-Santé Sud is the trustee or is a partner (i.e. data linkages).

DEFINITIONS:

[ORG.1411.PL.502.SD.01](#) PHIA Definitions.

PROCEDURE:

1. The Manager or Project Lead is responsible to identify activities that have privacy implications and to contact the Regional Privacy & Access Officer to determine if a PIA is required. Every reasonable effort should be made to initiate the PIA process at the earliest possible phase of project planning.

2. The Regional Privacy & Access Officer is responsible to:

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- Oversee the completion of the PIA and the action plan developed for non-compliance issues.
 - Where a complete Privacy Impact Assessment is required, initiate a PIA in consultation with, but not limited to, the Manager or Project Lead responsible for the system, the Information Communication Technology (ICT) representative, the systems administrator and any other persons delegated responsibility for the project as required.
 - For small-scale projects that do not warrant a complete PIA, conduct a brief privacy impact check. These projects may include a change request to an existing system or a small stand-alone system. The results of the check will involve a recommendation to proceed with the project/initiative/modification or for a complete PIA.
 - For modifications to an existing system where a PIA has already been completed, review the original PIA, amend as required, including the date of the amendment to reflect any changes. Where there are significant modifications, the Regional Privacy & Access Officer may choose to complete a new PIA.
 - Maintain all privacy assessment documentation including related actions plans for a period of 5 years beyond the lifespan of the system.
3. Where high risks have been identified thru the PIA process and there are no options to address risks, a recommendation to abandon the project / initiative / modifications may be made in consultation with applicable stakeholders.
 4. Copies of the completed PIA shall not be shared with outside agencies without the permission of the Regional Privacy & Access Officer.

SUPPORTING DOCUMENTS:

Privacy Impact Assessment Tool [ORG.1411.PL.301.FORM.01](#)

Privacy Impact Assessment Addendum [ORG.1411.PL.301.FORM.02](#)

Privacy Impact Assessment Guide [ORG.1411.PL.301.SD.01](#)

PHIA Definitions [ORG.1411.PL.502.SD.01](#)

REFERENCES:

The Personal Health Information Act

The Personal Health Information Regulations

The Freedom of Information and Protection of Privacy Act

Manitoba eHealth Privacy Impact Assessment Tool - 2014

Manitoba eHealth Privacy Impact Assessment Guide - 2014