



# Lanark, Leeds & Grenville Ontario Health Team

Working together to improve care in our communities

## Project Title: Conducting a Privacy Impact Assessment for the LLG OHT

### 1. Background

The Leeds Grenville Lanark Ontario Health Team (the OHT) wishes to ensure that it will have a robust privacy management program fully compliant with the *Personal Health Information Protection Act*, PHIPA regulations and privacy best practices.

The OHT is comprised of over 50 different organizations that include designated health information custodians (HICs). As a result of *Bill 106 Schedule 4 Personal Health Information Protection Act 2004*, it is anticipated that new regulations will enable certain collection, use and disclosure practices involving personal health information (PHI) for HICs. In preparation for Bill 106 being proclaimed, the OHT needs to ensure that the current practices of the HICs within the OHT including their administrative, physical, and technical safeguards are compliant. To the extent that they are not compliant the OHT requires an action plan to remedy such shortcomings.

Within the OHT are a number of organizations that may be subject to the *Freedom of Information and Protection of Privacy Act*, the *Municipal Freedom of Information and Protection of Privacy Act*, the *Mental Health Act*, the *Child, Youth and Family Services Act (Part X)*, the *Personal Information Protection and Electronic Documents Act* and, in some cases, not subject to any privacy law. There will need to be a data sharing agreement to address that reality.

### 2. Requirement

The OHT has a requirement for the professional services of one or more experienced Privacy Specialists capable of performing all related duties in support of the need for PHI sharing within the OHT and with other HICs in Ontario. This will entail canvassing the existing privacy regimes in all participating HICs and liaising with them on current and projected capabilities. The contractor is to start in July 2022 and the work is currently anticipated to be completed within three months, by September or October 2022. The completion time can be adjusted once the details of the scope and planning of activities is available.

### 3. Tasks

The contractor will perform, but not be limited to, the following tasks:

#### 3.1 Identify privacy risks and develop and recommend mitigation strategies.

- 3.2 Work with internal and external stakeholders to create the PIA
- 3.3 Work with the Information and Privacy Commissioner office (IPC) to ensure compliance with privacy best practices
- 3.4 Work with the Digital Health Committee and Collaboration Council to address all IPC questions

#### 4. Deliverables

The Contractor is responsible for the following deliverables:

- 4.1 A work plan and schedule to prepare and deliver the completed PIA to the Collaborative Council of the OHT and to the IPC
- 4.2 All documentation in regard to the PIA to the Collaboration Council
- 4.3 Written or verbal reports as requested by the Digital Health Committee or the Collaboration Council.

#### 5. Location of work

No dedicated office space will be provided for the contractor. The contractor may request temporary short term office space for meetings and general work. These requests are subject to availability based on each OHT partner.

#### 6. Constraints

The format of deliverables will be as specified and approved by the Collaboration Council. All deliverables are subject to inspection and acceptance by the Digital Health Committee prior to presentation to the Collaboration Council. Ensure compliance with applicable rules, legislation, regulations, standards and best practices.

#### 7. Travel

The contractor may be required to travel where virtual options is not possible or practical and will follow the necessary public health requirements where needed.

#### 8. Security

The contractor is considered a contractor of Rideau Community Health Services (RCHS), the OHT Fund Holder and employer. All work and artifacts developed by the contractor are to be stored within the technical infrastructure of RCHS.

#### 9. Next Steps

Expressions of interest can be emailed to LLG OHT Office Administrator, Cheryl Tataryn, [ctataryn@llgoht.ca](mailto:ctataryn@llgoht.ca) no later than July 8, 2022.