

Privacy Policy

Enterprise Master Patient Index (EMPI)

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1 Overview

1.1 Purpose

The Enterprise Master Patient Index (EMPI) Privacy Policy (the “Policy”) is structured around the ten fair information practice principles of the Canadian Standards Association’s *Model Code for the Protection of Personal Information*¹ and describes standards of privacy, confidentiality, and data security employed by the Ontario Ministry of Health and Long-Term Care (MOHLTC) to protect the personal health information collected, used, and disclosed via the Enterprise Master Patient Index (EMPI) in accordance with the Ontario *Personal Health Information Protection Act, 2004* (PHIPA) and the PHIPA Agent Agreement between the MOHLTC and eHealth Ontario.

1.2 Background

The provincial EMPI is a directory of identifiers pertaining to individuals that have been assigned by one or more organizations in the health sector, including hospitals and the MOHLTC. The EMPI ensures that personal health information for an individual, in the custody and control of organizations in the health sector, may be consistently linked to the correct individual.

It is expected that the EMPI, as a centralized identity management service for the province, will eventually support broader system-to-system interoperability for other Ontario e-Health initiatives in the future. Most importantly, the EMPI will provide the cornerstone for electronic records of personal health information in the province of Ontario.

2 Scope

This Policy applies to personal health information² collected, used, and disclosed via the EMPI, by the EMPI Operations Team, under eHealth Ontario, and on behalf of the MOHLTC, for the purpose of developing and maintaining the provincial EMPI which enables Ontario health care providers to accurately identify and organize records of personal health information that relate to an individual. This Policy identifies supporting documents and relevant authorities for each of the fair information practices, where appropriate.

¹ Canadian Standards Association’s *Model Code for the Protection of Personal Information* (Q830-96) sets out ten principles that balance the privacy rights of individuals and the information requirements of private organizations

² The definition of “personal health information” is found in section 4(1) of the Ontario *Personal Health Information Protection Act, 2004*. If there is a discrepancy between this Policy and any law, including PHIPA, legislation takes precedence.

3 Policy

3.1 Principle 1 - Accountability

An organization is responsible for personal information under its control and shall designate an individual or individuals who are accountable for the organization's compliance with the following principles.

3.1.1 Ontario Ministry of Health and Long-Term Care

The Ontario Ministry of Health and Long-Term Care (MOHLTC) is the “health information custodian”³ with custody and control of personal health information in the EMPI, and is subject to the rules respecting the collection, use, and disclosure of personal health information in the Ontario Personal Health Information Act, 2004 (PHIPA). The MOHLTC is ultimately accountable for the privacy of individuals’ personal health information which is collected, used, and disclosed via the EMPI.

The MOHLTC’s Manager, Access and Privacy Office, is the appointed contact person for the public for privacy matters relating to the EMPI, including requests for access to or correction of records of personal health information in the custody or control of the MOHLTC⁴.

3.1.2 eHealth Ontario

The MOHLTC designated eHealth Ontario, as its “agent”⁵, to operate the EMPI. The MOHLTC and eHealth Ontario have entered into a PHIPA Agent Agreement that sets out the terms and conditions for eHealth Ontario’s collection, use, disclosure, retention, and disposal of personal health information (see “Principle 7 – Safeguarding Personal Health Information” for more information on this administrative safeguard). eHealth Ontario also acts as a “health information network provider”⁶ by providing network services to the EMPI and health care organizations participating in the EMPI.

³ The definition of a “health information custodian” is found in section 3(1) of the Ontario *Personal Health Information Protection Act, 2004*.

⁴ The Ontario Ministry of Health and Long-Term Care’s *Statement of Information Practices and Public Notice: Collection, Use and Disclosure of Personal Health Information* are available at:
http://www.health.gov.on.ca/english/public/legislation/bill_31/personal_info.html

⁵ The definition of an “agent” is found in section 2 of the Ontario *Personal Health Information Protection Act, 2004*. All EMPI Operations Team members are responsible for managing the EMPI in compliance with this Policy.

⁶ The definition of a “health information network provider” is found in section 6(2) of the Ontario Regulation 329/04 made under the Ontario *Personal Health Information Protection Act, 2004*.

eHealth Ontario established an EMPI Operations Team which is responsible for managing administrative and functional tasks related to the EMPI. This includes linking and unlinking patient records, identifying duplicate records from the same source information system, and maintaining the overall accuracy and integrity of data in the EMPI. The EMPI Operations Team is located on eHealth Ontario's premises and eHealth Ontario ensures the physical security of these premises.

eHealth Ontario appointed an EMPI Privacy Lead who is responsible for:

- The maintenance and administration of this Policy;
- The day-to-day oversight of data protection practices within the EMPI
- Ensuring that access to the EMPI is limited to only that which is required by the individual to perform his or her job and re-assigning access rights where necessary;
- Acting as the privacy contact person for hospitals (i.e. "participating health care providers"), and the EMPI Solution Vendor⁷; and liaising with the MOHLTC on privacy related matters.

3.1.3 Participating Health Care Providers

Participating health care providers (e.g. hospitals) who will use the EMPI will do so in accordance with their obligations as "health information custodians" under PHIPA.

3.1.4 EMPI Solution Vendor

An EMPI Solution Vendor was selected to provide the EMPI software. When providing services relating to the EMPI, the EMPI Solution Vendor is acting as an "agent" (within the meaning of PHIPA) for participating health care providers. As an "agent", the EMPI Solutions Vendor is permitted to collect, use, disclose, retain and dispose of personal health information only if the health information custodian is permitted or required to do so and only in the course of the duties of the EMPI Solution Vendor⁸.

⁷ For the purposes of this Policy, the Enterprise Master Patient Index Solution Vendor provides the EMPI software. The Enterprise Master Patient Index Solution Vendor is Initiate Systems, Inc. Participating health care providers, the Ontario Ministry of Health and Long-term Care, Cancer Care Ontario, and the Enterprise Master Patient Index Solution Vendor entered into a Master Service Software License Agreement for the EMPI software. This Agreement specifies that the Enterprise Master Patient Index Solution Vendor is an "agent" of each participating hospital and, as such, provides comprehensive privacy protections for EMPI data in accordance with the privacy rules set out in for "agents" in the Ontario *Personal Health Information Protection Act, 2004*.

⁸ The responsibilities of an "agent" are found in section 17 of the Ontario *Personal Health Information Protection Act, 2004*.

Any amendments to the Policy must be approved by the MOHLTC and Vice-President, Privacy and Security of eHealth Ontario, in consultation with the Director of Privacy of eHealth Ontario. Amendments are communicated to EMPI Operations Team members by the EMPI Privacy Lead and to MOHLTC staff by the Manager, Access and Privacy Office.

3.2 Principle 2 - Identifying Purposes

The purposes for which personal information is collected shall be identified by the organization at or before the time the information is collected.

The MOHLTC collects personal health information relating to individuals receiving health care in Ontario for the purposes of developing and maintaining the provincial EMPI for participating health care providers (i.e. health information custodians) to accurately identify and organize records of personal health information about an individual. These purposes are outlined in the MOHLTC's statement of information practices, which is made available on the MOHLTC's website or upon request to either the MOHLTC's Manager, Access and Privacy Office or the EMPI Privacy Lead (see "Principle 8 – Openness" for contact information).

The EMPI Privacy Lead is responsible for training EMPI Operations Team members about this Policy, including the purposes for which the EMPI Operations Team collects, uses, discloses, and retains personal health information in the EMPI as well as the safeguards used to protect personal health information in the EMPI Operations Team's custody and control.

It remains the responsibility of participating health care providers, who collect information directly from individuals in order to submit it to the EMPI, to inform patients of the disclosure of their personal health information for the purposes of the EMPI. The EMPI Operation Team makes this Policy available to participating health care providers for use in their notices as appropriate. As a privacy "best practice", the EMPI Operations Team also makes available a written statement of information practices describing the purposes of the Operations Team's collection, use, and disclosure of personal health information (see "Principle 8 – Openness").

3.3 Principle 3 – Consent

The knowledge and consent of the individual are required for the collection, use, or disclosure of personal information, except where inappropriate.

3.3.1 Collection

MOHLTC

The MOHLTC collects personal health information, without consent, for the purpose for which it received the information from both participating health care providers and Cancer Care Ontario⁹ (CCO).

Participating Health Care Providers

Participating public hospitals connecting to the EMPI disclose personal health information, without individual patient consent, to the MOHLTC where permitted or required by law. Under Regulation 965 under the Public Hospitals Act, the Ontario Minister of Health and Long-Term Care requested that public hospitals provide information from records of personal health information to a person for the purposes of information and data collection, organization, and analysis¹⁰. All health information custodians (i.e. both public and private hospitals) are permitted to access the EMPI without patient consent for the purpose of enabling them to accurately identify individuals across the health system (see “Disclosure” below)¹¹.

CCO

For the purpose of the Wait Times Information System (WTIS), CCO (i.e. a entity prescribed under PHIPA¹²) discloses personal health information to the EMPI (in the custody and control of the MOHLTC), without consent, for the purposes of developing and maintaining the provincial EMPI for participating health care providers to accurately identify and organize records of personal health information about an individual. The MOHLTC uses personal health information from the MOHLTC’s Registered Persons Database (RPDB) without consent for the purpose of developing and maintaining the EMPI¹³.

⁹ The collection of personal health information from health information custodians by the Ontario Ministry of Health and Long-Term Care is permitted without consent pursuant to section 36(1)(c)(iii) of the *Personal Health Information Protection Act, 2004*.

¹⁰ A request was issued by the Ontario Minister of Health and Long-Term Care pursuant to section 23(b) of Regulation 965 made under the *Public Hospitals Act, 1990* which mandates hospitals to send personal health information to the Ontario Ministry of Health and Long-Term Care for the purpose of the EMPI. This data flow is permitted by section 43(1)(h) of the Ontario *Personal Health Information Protection Act, 2004*, which allows health information custodians to disclose personal health information where required by law (i.e. the *Public Hospitals Act, 1990*)

¹¹ Personal health information may be disclosed back to hospitals from the EMPI without patient consent for the purpose for which it was obtained or compiled or for a consistent purpose as per section 43(1)(f) of Ontario *Personal Health Information Protection Act, 2004* in conjunction with section 42(c) of the provincial *Freedom of Information and Protection of Privacy Act, 1990*.

¹² Cancer Care Ontario operates the Wait Times Information System under its authority as a “prescribed entity”, described in section 45(1) of the Ontario *Personal Health Information Protection Act, 2004*.

¹³ The transfer of personal health information within a single health information custodian or between a health information custodian and its agents is considered a “use” under the *Personal Health Information Protection Act, 2004* and not a “disclosure.”

3.3.2 Use¹⁴

3.3.3 Disclosure

Participating Health Care Providers

The MOHLTC discloses personal health information it collects under the Public Hospitals Act without consent to public hospitals participating in the EMPI to enable them to accurately identify and organize records of personal health information about an individual¹⁵.

No uses or disclosures of personal health information contained in the EMPI rely upon the authority of PHIPA's "lock box provisions"¹⁶. Consequently, individuals do not have the right to lock their personal health information from any uses or disclosures relating to the EMPI.

All exchanges of personal health information via the EMPI are permitted to occur without consent.

CCO

The MOHLTC discloses personal health information contained in the EMPI to CCO without consent for the purpose of analysis and compiling statistical information with respect to the management, evaluation, or monitoring of the allocation of resources or for the planning of all or part of the health system, including the delivery of services as part of the WTIS¹⁷.

3.4 Principle 4 - Limiting Collection of Personal Health Information

The collection of personal information shall be limited to that which is necessary for the purposes identified by the organization. Information shall be collected by fair and lawful means.

¹⁴ The transfer of personal health information from the Registered Persons Database to the EMPI (and vice versa) is a permitted *use* without consent under section 37(1)(c) as well as under the authority provided to the Ontario Ministry of Health and Long-Term Care under section 37(1)(k) of the Ontario *Personal Health Information Protection Act, 2004* in conjunction with section 2 of Ontario Regulation 272/06 made under the *Health Insurance Act, 1990*.

¹⁵ Personal health information may be disclosed back to hospitals from the EMPI for the purpose for which it was obtained or compiled or for a consistent purpose as per section 43(1)(f) of the Ontario *Personal Health Information Protection Act, 2004* in conjunction with section 42(c) of the provincial *Freedom of Information and Protection of Privacy Act, 1990*.

¹⁶ The term "lock box" is not a defined term under PHIPA. It is used within the health care community to describe a patient's right to withdraw or withhold his or her consent to the collection, use, or disclosure of personal health information among custodians for health care purposes as provided in sections 20(2), 37(1)(a), 38(1)(a) and 50(1)(e) of the Ontario *Personal Health Information Protection Act, 2004*.

¹⁷ Personal health information may be disclosed to the Wait Times Information System (operated by Cancer Care Ontario) without consent pursuant to section 45(1) of the *Personal Health Information Protection Act, 2004*.

The MOHLTC collects only the minimum amount of personal health information required to identify individuals receiving health care services and treatment in Ontario and to organize patient records. The following data elements are collected to assist EMPI Operations Team members in determining the identity of individuals to whom records of personal health information relate:

- Client name(s);
- Address;
- Gender;
- Birth date and/or death indicator; and
- Health card and/or medical record numbers¹⁸.

EMPI Operations Team members may also require additional information, such as next of kin, to help further identify clients where duplicate information exists.

The MOHLTC does not collect, use, disclose, or retain any clinical information, such as diagnoses or test results, for the purpose of developing and maintaining the EMPI. The MOHLTC does not use personal health information from the EMPI to contact individuals for any reason.

A privacy impact assessment (PIA) will be conducted on all new or amended collections of personal health information via the EMPI.

3.5 Principle 5 - Limiting Use, Disclosure and Retention of Personal Health Information

Personal information shall not be used or disclosed for purposes other than those for which it was collected, except with the consent of the individual or as required by law. Personal information shall be retained only as long as necessary for the fulfillment of those purposes.

The MOHLTC will only use and disclose personal health information it collects for the purpose of enabling participating health care providers (i.e. health information custodians) to accurately identify and organize records of personal health information about an individual via the provincial EMPI.

A PIA will be conducted on all new or amended uses and/or disclosures of personal health information via the EMPI.

¹⁸ The data elements collected by the Ontario Ministry of Health and Long-Term Care are set out in the request issued by the Ontario Minister of Health and Long-Term Care pursuant to section 23(b) of Regulation 965 made under the *Public Hospitals Act, 1990* which mandates hospitals to send personal health information to the Ontario Ministry of Health and Long-Term Care for the purpose of the EMPI.

3.5.1 Limiting Use

Use of the EMPI is restricted to:

- EMPI Operations Team members who require access to accurately identify and organize client records¹⁹;
- The MOHLTC's Registration and Claims branch to update the RPDB²⁰;
- Technical support staff at eHealth Ontario who require access to the EMPI to configure, upgrade, and support software²¹; and
- EMPI Solution Vendor staff who require access to configure the software and support eHealth Ontario in resolving software problems.

All access to the EMPI is facilitated through the eHealth Ontario registration process. EMPI Operations Team members are granted access to the EMPI only if they are required to access the EMPI in order to perform their job function(s) and have:

- Successfully completed privacy training;
- Signed a privacy acknowledgement, which attests they understood the privacy training; and
- Signed an Authorized PHIPA Agent Agreement outlining their responsibilities to protect the personal health information they have access to.

EMPI Solution Vendor staff are granted access to the EMPI only if they have approval from the EMPI Operations Team and are required to access the EMPI to perform support for the system, which includes analyzing, configuring, updating or resolving the EMPI software, uploading personal health information to the EMPI, and reviewing error logs generated by the EMPI in order to troubleshoot errors.

¹⁹ Section 37(1)(c) of the Ontario Personal Health Information Protection Act, 2004 permits the Ontario Ministry of Health and Long-Term Care to use personal health information for delivering its Enterprise Master Patient Index services that it funds or allocates resources to, including for monitoring and evaluating this initiative. The Enterprise Master Patient Index Office, acting on behalf of the Ontario Ministry of Health and Long-Term Care, may use EMPI data to support this mandate.

²⁰ Section 37(1)(k) of the Ontario Personal Health Information Protection Act, 2004 (PHIPA) permits a custodian to use personal health information where another law permits it. Section 2 of Ontario Regulation 272/06, made under the Health Insurance Act, 1990 allows the Ontario Ministry of Health and Long-Term Care to use the Registered Persons Database for Enterprise Master Patient Index-related purposes without patient consent. Such data can now be transferred to the EMPI for patient identification purposes as per section 6(1) of PHIPA which deems the providing of personal health information between a custodian and its agent a "use" and not a disclosure of the information.

²¹ The eHealth Ontario is permitted to use personal health information for technical support purposes pursuant to section 6(1) of Ontario Regulation 329/04 made under the Ontario *Personal Health Information Protection Act, 2004*.

EMPI Solution Vendor staff are only permitted to access the EMPI from eHealth Ontario premises (i.e. no remote access to the EMPI is available to the EMPI Solution Vendor staff). Access to the EMPI by the EMPI Solution Vendor is monitored by staff at the eHealth Ontario premises.

3.5.2 Limiting Disclosure

The MOHLTC discloses personal health information from the EMPI to:

Participating health care providers in order to accurately identify and organize records of personal health information about an individual²²; and the Wait Times Information Office to accurately identify and organize information in order to reduce duplicate records, improve wait list management, and increase administrative efficiency.

3.5.3 Limiting Retention

The EMPI collects personal health information throughout an individual's life by maintaining "point-in-time" reference data that will allow users to view the state and history of each patient's identifiable information at any given historical time. As such, all information contained in the EMPI is retained indefinitely and, at a minimum, for at least the lifetime of the patient.

- Personal health information contained in the EMPI is stored in electronic format (i.e. on servers) at secure eHealth Ontario facilities. The EMPI Operations Team temporarily retains hard-copy (i.e. paper) information in order to perform support and error resolution functions. The EMPI Operations Team physically destroys this data via secure shredding once it is no longer required for such functions. The EMPI Operations Team retains hard-copy data in secure locations, which are physically locked when unattended (e.g. locked drawers).

²² Section 43(1)(f) permits *Freedom of Information and Protection of Privacy Act* custodians (such as the Ontario Ministry of Health and Long-Term Care) to disclose personal health information for the same purpose for which it was obtained or compiled or for a consistent purpose as described in clause 42(c) of the *Freedom of Information and Protection of Privacy Act*. Section 3 of Ontario Regulation 272/06 made under the *Health Insurance Act, 1990* clarifies the Ontario Ministry of Health and Long-Term Care's authority to disclose personal health information from the Registered Persons Database for patient identification purposes. This section now allows the Ministry of Health and Long-Term Care to disclose Registered Persons Database information to custodians (e.g. hospitals) who have access to the Enterprise Master Person Index for "the purpose of assisting the health information custodian in accurately identifying and organizing records of personal health information." Accordingly, section 43(1)(h) of the *Personal Health Information Protection Act, 2004* permits health information custodians (i.e. the Ontario Ministry of Health and Long-Term Care) to disclose personal health information where permitted by another law - which in this case would be the Regulation made under the *Health Insurance Act, 1990*.

Upon request, EMPI Operations Team will provide the MOHLTC with verification that hard-copies of personal health information were shredded in accordance to the PHIPA Agent Agreement.

3.6 Principle 6 - Accuracy

Personal information shall be as accurate, complete, and up-to-date as is necessary for the purposes for which it is to be used.

It is not the current practice for the EMPI Operations Team to update “source” records (i.e. those received from participating health care organizations). Participating health care providers are required to take reasonable steps to ensure that the information they submit to the EMPI about their patients is as accurate, complete, and up-to-date as is necessary for the purposes of the EMPI.

EMPI Operations Team members support participating health care providers and the MOHLTC in maintaining the accuracy of the personal health information contained in the EMPI by:

- Conducting an assessment on the data collected from multiple sources (i.e. from multiple participating health care providers and the MOHLTC) to determine if the data represents a unique individual;
- Conducting a data cleansing exercise to correct, standardize, and validate data; and
- Using an industry-proven, real-time, probabilistic searching and weighting algorithm to support person matching and data quality in order to reduce person reconciliation errors at the source and reduce the time between error detection and correction.

EMPI Operations Team members also conduct manual corrections, merges, and unmerges of records to ensure accuracy.

3.7 Principle 7 – Safeguarding Personal Health Information

Personal information shall be protected by security safeguards appropriate to the sensitivity of the information.

The MOHLTC employs administrative, physical, and technical safeguards to protect all personal health information in the EMPI against loss or theft, as well as unauthorized access, disclosure, copying, use, or modification. These safeguards apply to information that is in paper or electronic form, in storage or in transit.

Administrative Safeguards

The MOHLTC uses this Policy and its supporting procedures, contractual means, and training to inform EMPI Operations Team members of the safeguards they must employ to protect the personal health information to which they have access via the EMPI.

The EMPI Privacy Lead is responsible for ensuring all EMPI Operations Team members have undergone training on this Policy and have confirmed their understanding of this Policy by signing a privacy acknowledgement form. All EMPI Operations Team members also sign an Authorized PHIPA Agent Agreement which outlines their responsibilities to protect the personal health information to which they have access.

Relevant agreements between the EMPI Solution Vendor, the MOHLTC, and eHealth Ontario outlines the confidentiality and privacy requirements the EMPI Solution Vendor must follow while providing its software to the participating health care providers and eHealth Ontario.

The EMPI Operations Team (i.e. on behalf of the MOHLTC) consults the Information and Privacy Commissioner/Ontario (IPC) concerning any proposed amendments or changes to the confidentiality or privacy obligations contained in the agreement²³. The EMPI Operations Team also advises the IPC if there is a breach of the confidentiality or privacy obligations of the agreement, the steps taken to mitigate the breach, the measures taken to prevent subsequent breaches, and the manner and nature of the notification provided to affected individuals whose personal health information is contained in the EMPI.

The MOHLTC reviews all EMPI software changes which the EMPI Solution Vendor proposes for the EMPI. Where the EMPI Operations Team determines that the change does not have any adverse operational, privacy, or security implications, EMPI Operations Team members will assist the EMPI Solution Vendor in implementing the software change.

The EMPI Operations Team also conducts audits of the EMPI Solution Vendor's compliance with the agreement to ensure confidentiality obligations are met.

Technical Safeguards

The EMPI Operations Team employs technical safeguards to protect the computers which are used by EMPI Operations Team members to access the EMPI and to protect the EMPI application itself.

EMPI Operations Team members protect their computers from unauthorized access by locking their screens when computers are unattended and by keeping their computer screens obstructed

²³ For a detailed description of the safeguards in place to protect personal health information in the Enterprise Master Patient Index from disclosure outside of Ontario, see the Information and Privacy Commissioner/Ontario's *Investigation Report - PHIPA Report HI06-45: Initiate Systems Inc. and the Ontario Ministry of Health and Long-Term Care*, August 25, 2006.

Finally, the EMPI Operations Team requires all participating health care providers to verify they meet their requirements under PHIPA before they are granted access to the EMPI.

or out of view when attended to ensure the privacy of visible information. All software installed on EMPI Operations Team computers must be authorized by the EMPI Manager.

All EMPI Operations Team members access the EMPI using a unique login and password. User activity in the EMPI is logged, allowing for an audit trail of user activity. The EMPI Manager reviews access to the EMPI by EMPI Operations Team members on a regular basis. Should the EMPI Manager discover unauthorized activity, access by the individual in question to the EMPI is disabled and the MOHLTC's Manager, Access and Privacy Office and Director, Registration and Claims branch will be notified of the activity. Where the activity leads to the inappropriate use, disclosure, or access of personal health information, disciplinary action will be taken, up to and including termination of employment and notifying any relevant regulatory bodies and/or professional associations.

The EMPI does not contain any "back door" or "gated" access which may be used to gain undetected access to the EMPI.

Physical Safeguards

The EMPI Operations Team is located at eHealth Ontario, which maintains a physically secure environment for the EMPI Operations Team and staff workstations, including pass-only entry and locked cabinets and desks. The EMPI Privacy Lead reviews the physical security safeguards on an annual basis to ensure that they adequately protect personal health information.

The eHealth Ontario data centre, where the EMPI is hosted, is protected by:

- a physical security perimeter;
- restricted access to its operational environment;
- video monitoring; and
- a security guard on duty 24 hours a day, 7 days a week.

3.8 Principle 8 – Openness

An organization shall make readily available to individuals specific information about its policies and practices relating to the management of personal information.

The MOHLTC makes information about its privacy practices and the collection, use, disclosure, and retention of personal health information in its custody and control, including information on the EMPI, available to the public on its website. Individuals can also contact the Manager, Access and Privacy Office at: General Inquiries, Ontario Ministry of Health and Long-Term Care, 5700 Yonge St., 5th Floor, Toronto, Ontario M2M 4K5 or (416) 327-7040.

The MOHLTC also makes specific information about the privacy practices in place at the EMPI Operations Team and the collection, use, disclosure, and retention of personal health information via the EMPI available to EMPI Operations Team members, the general public, participating

health care providers, and the IPC. This information is made available by contacting the EMPI Privacy Lead at: 777 Bay Street, Suite 701, PO Box 148, Toronto, Ontario M5G 2C8 or E-Health Support Centre. This material assists participating health care providers to inform their patients about the EMPI and answer questions from patients and their families.

3.9 Principle 9 - Individual Access

Upon request, an individual shall be informed of the existence, use, and disclosure of his or her personal information and shall be given access to that information. An individual shall be able to challenge the accuracy and completeness of the information and have it amended as appropriate.

Individuals may request access to or correction of their records of personal health information in the EMPI by contacting the MOHLTC's Manager, Access and Privacy Office in writing at: Ontario Ministry of Health and Long-Term Care, 5700 Yonge St., 5th Floor, Toronto, Ontario M2M 4K5.

Should the EMPI Privacy Lead receive a request from an individual who wishes to access or correct his or her record of personal health information in the EMPI, the EMPI Privacy Lead will immediately refer the requestor to the MOHLTC's Manager, Access and Privacy Office.

3.10 Principle 10 - Challenging Compliance

An individual shall be able to address a challenge concerning compliance with the above principles to the designated individual or individuals accountable for the organization's compliance.

An individual may challenge compliance with this Policy by submitting his or her privacy questions or concerns to the MOHLTC in writing at: Ontario Ministry of Health and Long-Term Care, Access and Privacy Office, 5700 Yonge St., 5th Floor, Toronto, Ontario M2M 4K5. The MOHLTC investigates all complaints and will respond to the complainant promptly outlining the findings of the investigation. The EMPI Privacy Lead will provide assistance to the MOHLTC with regard to any relevant privacy concerns, including complaints or questions, and reviews conducted by the IPC.

Should the EMPI Privacy Lead receive questions or concerns regarding this Policy, the EMPI Privacy Lead will immediately refer the complainant to the MOHLTC's Manager, Access and Privacy Office. The contact information for the Enterprise Master Patient Index Privacy Lead is EMPIPrivacy@eHealthOntario.on.ca. Should an individual's complaint not be resolved to his or her satisfaction, the individual may file a complaint with the Information and Privacy Commissioner/Ontario at: Information and Privacy Commissioner/Ontario, 2 Bloor Street East, Suite 1400, Toronto, Ontario, M4W 1A8; Toll Free: 1800-387-0073; www.ipc.on.ca