

eHealth Ontario

Directory of Records

Privacy Office

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*Enquiries relating to this document should be referred to the responsible Document Prime.

Approval History

Approver(s)	Title	Approved Date
Abigail Carter-Langford	Vice President and Chief Privacy Officer	2016-12-16

Revision History

Version No.	Version Date YYYY-MM-DD	Summary of Change	Changed By
3.5	2016-12-16	Revisions to address changes in organizational structure	Jennifer Doak, Promila Gonsalves and Abigail Carter-Langford
3.4	2014-10-22	Incorporated CPO and Privacy Manager Feedback	Jennifer Doak and Promila Gonsalves
3.3	2014-08-20	Incorporated Legal Service's Feedback	Jennifer Doak and Promila Gonsalves
3.2	2014-07-09	Included Retention Schedules	Jennifer Doak and Promila Gonsalves
3.1	2014-05-30	Feedback received from business units for Personal Information Bank	Promila Gonsalves
3.0	2014-03-12	Revisions as per Annual Review to include	Michelle Beharry,

		Personal Information Bank	Jennifer Doak, Promila Gonsalves
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1.0	2011-10-20	Initial Draft	Anne Motwani

1 Purpose / Objective

eHealth Ontario Privacy Office maintains the *eHealth Ontario Directory of Records* of all holdings for both Personal Information (PI) and Personal Health Information (PHI), collectively referred to as “information”, in accordance with its *eHealth Ontario Personal Information Privacy Policy* and *eHealth Ontario Personal Health Information Privacy Policy*, and further to the requirement under the *Freedom of Information and Protection of Privacy Act, 1990 (FIPPA)*.

2 Scope

eHealth Ontario’s Privacy Office maintains the *eHealth Ontario Directory of Records* found on eHealth Ontario’s website. eHealth Ontario periodically reviews the *eHealth Ontario Directory of Records* to ensure that the content is accurate and complete.

eHealth Ontario shall ensure that:

- The confidentiality of the information described in the *eHealth Ontario Directory of Records* is protected in accordance with applicable legislative and regulatory requirements;
- Access is restricted to those personnel or third party service providers whose roles require such access;
- Access is logged, including the name of person who accessed the information, the purpose for the access, and the date and time of the access;
- Access logs are reviewed periodically to ensure all access to PI and PHI is required for the purposes identified; and
- Data repositories are retained only as long as are needed to fulfill the purposes for which they were collected.

3 Directory of Records

eHealth Ontario maintains general Records and Corporate Records. General records are held under the following business areas:

- Architecture & Standards
- Corporate Services and Finance
 - Strategic Sourcing and Vendor Relations
 - Risk Management
 - Internal Audit
 - Human Resources
- Enterprise Planning and Reporting, including Stakeholder Relations & Communications
- Legal and Corporate Compliance
- Technology and Operations
- Privacy, Freedom of Information & Records Management

eHealth Ontario maintains Corporate Records referred to as Personal Information Banks (PIBs) and Data Holdings (repositories) for the Electronic Health Record (EHR). The Index in section 3.1 contains:

- Information regarding PIBs held by eHealth Ontario under FIPPA that are required to be made publically available; and
- Information regarding Data Holdings held by eHealth Ontario under the Ontario Regulation 43/02 under the *Development Corporations Act* (DCA) Regulation and the *Personal Health Information Protection Act*, 2004 (PHIPA) that is made publically available as a best practice.

eHealth Ontario has in place policies and practices that apply to the maintenance (i.e. retention, disposal) of the PI and PHI held within the PIBs and Data Holdings. Please refer to the *eHealth Ontario Privacy and Data Protection Policy*, the *eHealth Ontario Personal Information Privacy Policy*, and the *eHealth Ontario Personal Health Information Privacy Policy* for more information about these holdings.

The *eHealth Ontario FIPPA Access Request Policy* governs eHealth Ontario's obligations to permit individuals or other persons to exercise their rights under FIPPA. In particular, the records identified in the PIBs may be subject to a freedom of information request. The PIBs are made available to the public via the Ministry of Government Services.

Further information about eHealth Ontario and its operations is available to the public at www.ehealthontario.on.ca. Further information about specific data sets retained by eHealth Ontario can be found on our [Open Data webpage](#).

3.1 Index of Personal Information Banks (PIB) and Data Holdings

Name of Data Store:	Business Continuity Management Records
Type:	Personal Information Bank
Location:	Human Resources
Data elements Containing PI/PHI:	Personal contact information including names, phone numbers and email addresses.
Individuals in Bank	eHealth Ontario Personnel
Source of data:	eHealth Ontario Personnel
Statement of purpose identifying the need for PI/PHI:	Information used for emergency response where eHealth Ontario personnel need to be contacted.
Users:	Human Resources; Strategic Sourcing & Vendor Relations; Operations; Security Services
Legislative authority:	Freedom of Information and Protection of Privacy Act
Retention:	Current Calendar Year + 2 years after superseded

Name of Data Store:	Client Registry
Type:	Data Holding
Data elements Containing PI/PHI:	Demographic information and unique identifiers assigned to individuals (e.g. health card numbers).
Individuals in Bank	Individuals who are registered for Ontario health insurance coverage and the Ontario Drug Benefits Program
Source of data:	Ministry of Health and Long-Term Care
Statement of purpose identifying the need for PI/PHI:	Ontario's provincial client registry uniquely identifies individuals based on demographic information, detects duplicate records and links data from a variety of applications.
Users:	Health Care Providers
Legislative authority:	Personal Health Information Protection Act, Ontario Regulation 329/04 section 6.2
Retention:	As directed by the Ministry of Health and Long Term Care

Name of Data Store:	Consent Management Registry
Type:	Data Holding
Data elements Containing PI/PHI:	Demographic information, consent directives and unique identifiers assigned to individuals (e.g. health card numbers).
Individuals in Bank	Individuals who have requested a consent directive for an eHealth Ontario service.
Source of data:	Individuals and contributing custodians
Statement of purpose identifying the need for PI/PHI:	Ontario's consent registry supports individuals consent directive instructions in the EHR.
Users:	eHealth Ontario Privacy Office
Legislative authority:	Personal Health Information Protection Act, Ontario Regulation 329/04 section 6.2
Retention:	As defined in the <i>Electronic Health Record Retention Policy</i> and as directed by the Ministry of Health and Long-Term Care

Name of Data Store:	Diagnostic Imaging Common Services (DI CS)
Type:	Data Holding
Data elements Containing PI/PHI:	Clinical diagnostic images and reports (e.g. description of x-ray results)
Individuals in Bank	Patients
Source of data:	Participating custodians
Statement of purpose identifying the need for PI/PHI:	Enables authorized health care providers to share diagnostic images and reports with other providers within their respective regional diagnostic imaging repositories for the provision of health care.
Users:	Health Care Providers
Legislative authority:	Personal Health Information Protection Act section 17; Personal Health Information Protection Act, Ontario Regulation 329/04 section 6.2
Retention:	As defined in the <i>Electronic Health Record Retention Policy</i>

Name of Data Store:	ConnectingOntario Clinical Data Repository (includes Interim Client Registry)
Type:	Data Holding
Data elements Containing PI/PHI:	Clinical documents and reports. Available data and information includes: cardiovascular reports, neurophysiology reports, infection control information, hospital discharge summaries, diagnostic imaging reports (e.g. x-rays), respiratory reports, allergy information, medication information from hospitals and emergency department reports.
Individuals in Bank	Patients and Clients of Participating Custodians
Source of data:	Participating custodians
Statement of purpose identifying the need for PI/PHI:	Facilitates access by care providers to complete, up-to-date and accurate information to support care.
Users:	Health Care Providers
Legislative authority:	Personal Health Information Protection Act section 17; Personal Health Information Protection Act, Ontario Regulation 329/04 section 6.2
Retention:	As defined in the <i>Electronic Health Record Retention Policy</i>

Name of Data Store:	Enterprise Master Patient Index (EMPI)
Type:	Data Holding
Data elements Containing PI/PHI:	Demographic information and unique identifiers assigned to individuals (e.g. health card number).
Individuals in Bank	Individuals who are registered for Ontario health insurance coverage, the Ontario Drug Benefits Program and individuals admitted , discharged or transferred from participating hospitals.
Source of data:	Ministry of Health and Long-Term Care; participating hospitals; Cancer Care Ontario
Statement of purpose identifying the need for PI/PHI:	Enables Health Care Providers to search and uniquely identify patients to provide health care.
Users:	Health Care Providers; Cancer Care Ontario
Legislative authority:	Personal Health Information Protection Act section 17; Personal Health Information Protection Act, Ontario Regulation 329/04 section 6.2
Retention:	As directed by the Ministry of Health and Long Term Care

Name of Data Store:	Financial Records																		
Type:	Personal Information Bank																		
Location:	Corporate Services & Finance																		
Data elements Containing PI/PHI:	Data related to financial management functions, including names, demographic information, banking information, social insurance numbers, etc, of eHealth Ontario personnel and service providers.																		
Individuals in Bank	eHealth Ontario Personnel; eHealth Ontario Service Providers																		
Source of data:	eHealth Ontario Personnel; eHealth Ontario Service Providers; Corporate Services & Finance; Human Resources; Strategic Sourcing & Vendor Relations																		
Statement of purpose identifying the need for PI/PHI:	Information is used for financial management including accounts payable, accounts receivable, etc.																		
Users:	Corporate Services & Finance; Human Resources; Strategic Sourcing & Vendor Relations																		
Legislative authority:	Freedom of Information and Protection of Privacy Act; Income Tax Act; Development Corporations Act Ontario Regulation 43/02																		
Retention:	<table border="1"> <tr> <td>Budgets and Allocations</td> <td>Current Fiscal Year + 10 years after all administrative actions are completed</td> </tr> <tr> <td>Source Documents</td> <td>Current Fiscal Year + 7 years after all administrative actions are completed</td> </tr> <tr> <td>Accounts Payable</td> <td>Current Fiscal Year + 7 years after all administrative actions are completed</td> </tr> <tr> <td>Accounts Receivable</td> <td>Current Fiscal Year + 7 years after all administrative actions are completed</td> </tr> <tr> <td>Reconciliations- Financial Control</td> <td>Current Fiscal Year + 7 years after all administrative actions are completed</td> </tr> <tr> <td>Financial Reporting</td> <td>Current Fiscal Year + 8 years after all administrative actions are completed</td> </tr> <tr> <td>Payroll- Financial</td> <td>Current Fiscal Year + 7 years after all administrative actions are completed</td> </tr> <tr> <td>Banks and Banking</td> <td>Current Fiscal Year + 7 years after all administrative actions are completed</td> </tr> <tr> <td>Purchasing Cards- Administration</td> <td>Current Fiscal Year + 7 years after card expires, is replaced or cancelled, or after termination of employment</td> </tr> </table>	Budgets and Allocations	Current Fiscal Year + 10 years after all administrative actions are completed	Source Documents	Current Fiscal Year + 7 years after all administrative actions are completed	Accounts Payable	Current Fiscal Year + 7 years after all administrative actions are completed	Accounts Receivable	Current Fiscal Year + 7 years after all administrative actions are completed	Reconciliations- Financial Control	Current Fiscal Year + 7 years after all administrative actions are completed	Financial Reporting	Current Fiscal Year + 8 years after all administrative actions are completed	Payroll- Financial	Current Fiscal Year + 7 years after all administrative actions are completed	Banks and Banking	Current Fiscal Year + 7 years after all administrative actions are completed	Purchasing Cards- Administration	Current Fiscal Year + 7 years after card expires, is replaced or cancelled, or after termination of employment
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Banks and Banking	Current Fiscal Year + 7 years after all administrative actions are completed																		
Purchasing Cards- Administration	Current Fiscal Year + 7 years after card expires, is replaced or cancelled, or after termination of employment																		

Name of Data Store:	ONE® ID
Type:	Personal Information Bank
Location:	n/a
Data elements Containing PI/PHI:	Registration information (e.g. license and date of birth) for registered users.
Individuals in Bank	Registered users of eHealth Ontario products and services
Source of data:	ONE ID clients
Statement of purpose identifying the need for PI/PHI:	Identity management service provided to registrants of eHealth Ontario products and services to ensure reliable and secure access to personal health information.
Users:	eHealth Ontario Service Desk
Legislative authority:	Development Corporations Act Ontario 43/02
Retention:	Current Calendar Year + 7 years after registration is completed and/or withdrawn

Name of Data Store:	Ontario Laboratories Information System (OLIS)
Type:	Data Holding
Data elements Containing PI/PHI:	Laboratory test results and lab test orders.
Individuals in Bank	Individuals receiving results from participating laboratories
Source of data:	The Ministry of Health and Long-Term Care; participating laboratories including private, public and hospital laboratories
Statement of purpose identifying the need for PI/PHI:	Connects Ontario hospitals, community laboratories, public health laboratories and practitioners to enable the secure exchange of lab test orders and results. Provides authorized Health Care Providers and Laboratories with access to patients' laboratory test orders and results for health care-related purposes.
Users:	Health Care Providers; laboratories
Legislative authority:	Personal Health Information Protection Act section 17; Personal Health Information Protection Act, Ontario Regulation 329/04 section 6.2
Retention:	As directed by the Ministry of Health and Long Term Care

Name of Data Store:	OLIS 2 Patient
Type:	Data Holding
Data elements Containing PI/PHI:	Enrollment information from participating individuals for OLIS 2 Patient Project including demographic information.
Individuals in Bank:	Participating OLIS 2 Patient individuals
Source of data:	Participating OLIS 2 Patient individuals through the Ministry of Health and Long Term Care
Statement of purpose identifying the need for PI/PHI:	This patient demographic information was collected for the purpose of registering and authenticating participating individuals in the OLIS 2 Patient Project to access their OLIS information.
Users:	Archived - not actively in use.
Legislative authority:	Development Corporations Act Ontario Regulation 43/02
Retention:	As directed by the Ministry of Health and Long Term Care

Name of Data Store:	Patient Advisory Panel
Type:	Personal Information Bank
Location:	Office of the Chief Medical Informatics Officer
Data elements Containing PI/PHI:	Enrollment information, including demographic information and health information (e.g. relevant medical history), from participating individuals of the Patient Advisory Panel.
Individuals in Bank:	Patient Advisory Panel Members
Source of data:	Patient Advisory Panel Members
Statement of purpose identifying the need for PI/PHI:	The Panel provided patients' and caregivers' viewpoints and perspectives on clinically-focused activities taking place within eHealth Ontario. In addition, provides qualitative data on the perceptions, opinions, beliefs and attitudes towards ehealth systems.
Users:	Archived – no longer in use.
Legislative authority:	Development Corporations Act Ontario Regulation 43/02
Retention:	Current Calendar Year + 10 years

Name of Data Store:	Personnel Records	
Type:	Personal Information Bank	
Location:	Human Resources	
Data elements Containing PI/PHI:	Data related to employment functions including work history, demographic information, photo identification, performance evaluations, etc.	
Individuals in Bank	Prospective Employees; eHealth Ontario Personnel; Former eHealth Ontario Personnel	
Source of data:	Human Resources; Corporate Services & Finance; Prospective Personnel; eHealth Ontario Personnel; Former eHealth Ontario Personnel	
Statement of purpose identifying the need for PI/PHI:	Information used for employment purposes.	
Users:	Human Resources; Corporate Services & Finance; Legal & Corporate Compliance; eHealth Ontario Service Desk	
Legislative authority:	Freedom of Information and Protection of Privacy Act	
Retention:	Individual Employee Files	Current Calendar Year + 50 years after termination of employment
	Individual Employees Files - Program Area Copy	Current Calendar Year + 2 years after employee no longer assigned to program area <input type="checkbox"/>
	Job Positions and Classifications	Current Calendar Year + 11 years after superseded
	Staffing - Competitions	Current Calendar Year + 6 years after position staffed
	Staffing - Unsolicited Applications	Current Calendar Year + 2 year after resume is received
	Hours of Work	Current Calendar Year + 10 years after guidelines are superseded or agreement expires
	Leave and Absenteeism	Current Calendar Year + 2 years after superseded
	Training and Development	Current Calendar Year + 2 year after all administrative actions are completed

Name of Data Store:	Provider Registry (PR)
Type:	Personal Information Bank
Data elements Containing PI/PHI:	Provider information including provider credentials (e.g. license status) and specific demographic information.
Individuals in Bank	Members of participating Regulated Health Professional Colleges
Source of data:	Ministry of Health and Long-Term Care; Regulatory Health Professional Colleges
Statement of purpose identifying the need for PI/PHI:	The authoritative repository for provider identification data sourced from the Ministry of Health and Long-Term Care's Corporate Providers Database and the data feeds from Regulated Health Professional colleges in Ontario. Supports the identification of each unique provider and provides the foundation for user registration and enrolment into eHealth Ontario's products and services.
Users:	eHealth Ontario Applications (e.g. ONE ID) and partners.
Legislative authority:	Freedom of Information and Protection of Privacy Act Development Corporations Act Ontario Regulation 43/02
Retention:	As directed by the Ministry of Health and Long Term Care and <i>Electronic Health Record Retention Policy</i> .

Name of Data Store:	Vendor Relations Records				
Type:	Personal Information Bank				
Location:	Strategic Sourcing & Vendor Relations				
Data elements Containing PI/PHI:	Procurement information including requests for proposals, vendor evaluations, banking information, contracts, etc.				
Individuals in Bank	Prospective Service Providers; eHealth Ontario Service Providers; Former eHealth Ontario Service Providers				
Source of data:	Strategic Sourcing & Vendor Relations; Corporate Services & Finance; Prospective Service Providers; eHealth Ontario Service Providers; Former eHealth Ontario Service Providers				
Statement of purpose identifying the need for PI/PHI:	Information used for procurement purposes.				
Users:	Strategic Sourcing & Vendor Relations; Corporate Services & Finance; Legal & Corporate Compliance				
Legislative authority:	Freedom of Information and Protection of Privacy Act				
Retention:	<table border="1"> <tr> <td>Tendered Purchases</td> <td>Current Fiscal Year + 7 years after expiration of contract</td> </tr> <tr> <td>Non-Tendered Purchases: Quotations and Purchase Orders</td> <td>Current Fiscal Year + 7 years after all administrative actions are completed</td> </tr> </table>	Tendered Purchases	Current Fiscal Year + 7 years after expiration of contract	Non-Tendered Purchases: Quotations and Purchase Orders	Current Fiscal Year + 7 years after all administrative actions are completed
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Non-Tendered Purchases: Quotations and Purchase Orders	Current Fiscal Year + 7 years after all administrative actions are completed				

3 Glossary

The following terminology and acronyms are associated with this document:

TERM	DEFINITION
Corporate Record	Recorded information created or commissioned, owned or controlled by eHealth Ontario to support its administrative and management functions, including human resource management, purchasing, accommodations and moveable assets management, financial management, audit management, information and information technology management (including systems, recorded information management, and FIPPA and PHIPA support records), legal, communications services, policy and planning, and general administration. ¹
Data Repository	A logical partitioning of data where multiple databases that apply to specific applications or sets of applications reside. For example, several databases that support healthcare applications could reside in a single healthcare data repository.
<i>Freedom of Information and Protection of Privacy Act, R.S.O. 1990, c. F. 31 (FIPPA)</i>	A provincial privacy statute that provides a right to access information under the control of institutions in accordance with the principles that information should be available to the public; necessary exemptions from the right of access should be limited and specific; and decisions on the disclosure of government information should be reviewed independently of government. FIPPA also protects the privacy of personal information of individuals held by institutions. It provides individuals with a right of access to, and correction of, that information.
Electronic Health Record (EHR)	Has the same meaning as defined in PHIPA, and generally means a record of PHI in electronic form created or maintained by eHealth Ontario.
Health Information Custodian (HIC)	Has the same meaning as defined in section 3 of <i>Personal Health Information Protection Act, 2004</i> (PHIPA), and generally means a person or organization that delivers healthcare services. Examples include: physicians, hospitals, pharmacies, laboratories, community care access centres and the Ministry of Health and Long-Term Care but not eHealth Ontario.
Personal Health Information (PHI)	Has the same meaning as defined in section 4 of the <i>Personal Health Information Protection Act, 2004</i> (PHIPA), and generally means identifying information about an individual in oral or recorded form, pertaining to that person's health or health services provided to the individual. Examples include family health history, health card number, and any information that identifies an individual and links them to a healthcare provider.
<i>Personal Health Information Protection</i>	A provincial health privacy statute that establishes rules for the management of PHI and protection of the confidentiality of that information, while facilitating the effective delivery of healthcare services.

¹ eHealth Ontario Records Management Policy

TERM	DEFINITION
Act, 2004, S.O. 2004, c. 3. (PHIPA)	
Personnel	eHealth Ontario employees and temporary staff (contractors, temp agency staff, co-op students and seconded individuals.) Contractors are individuals procured through a company for a specified period of greater than 3 months to fill a permanent full time position temporarily and on a day- to- day basis are managed directly by eHealth Ontario management.
Record	Has the same meaning as defined in the <i>eHealth Ontario Records Management Policy</i> , and applies to Information in any form, including a record made, recorded, transmitted or stored in digital form or in other intangible form by electronic, magnetic, optical or any other means, but does not include a mechanism or system for making, sending, receiving, storing or otherwise processing information (Archives and Recordkeeping Act, 2006). ²
Third Party Service Provider	An individual or entity that eHealth Ontario contracts to act on the Agency's behalf to provide goods or services that assist in the delivery of eHealth Ontario Services. The term includes vendors, consultants and service delivery partners.

Table 1: Directory of Records: Glossary

4 References and Associated Documents

The following are legislative references and eHealth Ontario policies associated with this document:

REFERENCE	LOCATION
Freedom of Information and Protection of Privacy Act, 1991 (FIPPA) and regulations	http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90f31_e.htm
Personal Health Information Protection Act, 2004 (PHIPA) and regulations	http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_04p03_e.htm
O. Reg 43/02. under the Development Corporations Act	http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_020043_e.htm

² *eHealth Ontario Records Management Policy*

REFERENCE	LOCATION
eHealth Ontario Personal Health Information Privacy Policy	http://www.ehealthontario.on.ca/images/uploads/pages/documents/PHI_PrivacyPolicy_EN.pdf
eHealth Ontario Personal Information Privacy Policy	http://www.ehealthontario.on.ca/images/uploads/pages/documents/PI_PrivacyPolicy_EN.pdf
eHealth Ontario Statement of Information Practices	http://www.ehealthontario.on.ca/images/uploads/pages/documents/StatementofInformationPractices.pdf
eHealth Ontario FIPPA Access Request Policy	Internal eHealth Ontario SharePoint
eHealth Ontario Records Schedule	Internal eHealth Ontario SharePoint

Table 2: Directory of Records: References and Associated Documents