



Information and Privacy
Commissioner of Ontario
Commissaire à l'information
et à la protection de la vie privée de l'Ontario

October 31, 2011

VIA ELECTRONIC AND REGULAR MAIL

Michel Bilodeau, President and CEO
Children's Hospital of Eastern Ontario
401 Smyth Road
Ottawa, Ontario
K1H 8L1

Dear Mr. Bilodeau:

RE: Review of the Practices and Procedures of the Children's Hospital of Eastern Ontario in respect of the Better Outcomes Registry and Network

Pursuant to subsection 13(2) of Regulation 329/04 of the *Personal Health Information Protection Act, 2004* ("the *Act*"), my office is responsible for reviewing the practices and procedures implemented by each "prescribed person" to protect the privacy of individuals whose personal health information it receives and to protect the confidentiality of that information.

The practices and procedures of the prescribed person, the Children's Hospital of Eastern Ontario, in respect of the Better Outcomes Registry and Network were initially approved as of August 8, 2011. However, as you are aware, in order to synchronize the timing of the reviews of all of the prescribed persons under the *Act*, this approval only remained in effect until October 30, 2011. The Children's Hospital of Eastern Ontario was requested to submit a letter to the IPC noting any changes to the practices and procedures that were outlined in the IPC Report, dated August 8, 2011, and any steps that have been taken to address the recommendation outlined in the Report, so that my office could review and approve these practices and procedures effective October 31, 2011 for a further period of three years.

My office has now completed its review of your policies, procedures and most recent letter, dated October 7, 2011. Based on this review, I am satisfied that the Children's Hospital of Eastern Ontario in respect of the Better Outcomes Registry and Network has in place practices and procedures that sufficiently protect the privacy of individuals whose personal health information it receives and that sufficiently maintain the confidentiality of that information.

Attached is an Appendix which makes a recommendation to further enhance the practices and procedures of the Children's Hospital of Eastern Ontario in respect of the Better Outcomes Registry and Network which must be implemented prior to the next legislated review.

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I would like to extend my gratitude to you and your staff for the cooperation provided during the course of the review, including your diligence and timeliness in submitting the requested documentation, in responding to requests by my office for further information and in making the amendments requested to the practices and procedures of the Children's Hospital of Eastern Ontario, in respect of the Better Outcomes Registry and Network.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Ann Cavoukian', written in a cursive style.

Ann Cavoukian, Ph.D.
Commissioner

Attach.

cc: Susan Richardson, BORN Executive Lead,
Mari Teitelbaum, Acting BORN Director

Appendix

It is recommended that the Children's Hospital of Eastern Ontario, in respect of the Better Outcomes Registry and Network develop and implement a written policy and procedures with respect to business continuity and disaster recovery, in accordance with the requirements in the *Manual for the Review and Approval of Prescribed Persons and Prescribed Entities*, prior to the next review of its practices and procedures.