



Information and Privacy
Commissioner of Ontario

Commissaire à l'information et à la
protection de la vie privée de de l'Ontario

VIA ELECTRONIC AND REGULAR MAIL

October 31, 2017

Sheila Jarvis
Interim CEO
Cardiac Care Network of Ontario
4100 Yonge Street, Suite 502
Toronto, ON M2P 2B5

Dear Ms. Jarvis:

RE: Review of the Report on the Practices and Procedures of the Cardiac Care Network of Ontario in respect of its registry of cardiac and vascular services

Pursuant to subsection 13(2) of Regulation 329/04 under the *Personal Health Information Protection Act, 2004* ("the *Act*"), the Office of the Information and Privacy Commissioner of Ontario (IPC) is responsible for reviewing the practices and procedures implemented by an organization that has been designated as a prescribed person for the purposes of subsection 39(1)(c) of the *Act*, to protect the privacy of individuals whose personal health information it receives, and to protect the confidentiality of that information.

Given the practices and procedures of the Cardiac Care Network of Ontario (CCN), a prescribed person within the meaning of the *Act*, were last approved on October 31, 2014, the IPC was again required to review these practices and procedures and advise whether they continue to meet the requirements of the *Act* on or before October 31, 2017.

In accordance with the process set out in the *Manual for the Review and Approval of Prescribed Persons and Prescribed Entities* ("the *Manual*"), CCN, as a prescribed person seeking the continued approval of its practices and procedures, submitted a detailed written report and sworn affidavit to the IPC. These documents were to conform to the requirements set out in the *Manual*.

The IPC has now completed its review of your report and affidavit. Based on this review, I am satisfied that CCN continues to have in place practices and procedures that sufficiently protect the privacy of individuals whose personal health information it receives, that sufficiently maintain the confidentiality of that information and that continue to meet the requirements of the *Act*.

Accordingly, effective October 31, 2017, I am pleased to advise that the practices and procedures of CCN in respect of its registry of cardiac and vascular services continue to be approved for a further three-year period.

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Attached is an Appendix containing recommendations to further enhance the practices and procedures of CCN.

I would like to extend my gratitude to you and your staff for your cooperation 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.

Sincerely,

Original signed by:

Brian Beamish
Commissioner

Encl.

cc: Garth Oakes, Director, Privacy and Research Development

Appendix

1. It is recommended that CCN ensure that its agents complete ongoing privacy training on an annual basis as required by the *Manual for the Review and Approval of Prescribed Persons and Prescribed Entities* (“the Manual”).
2. It is recommended that CCN implement a Corporate Risk Register, as required by the *Manual*, as soon as reasonably possible, providing written confirmation to the Information and Privacy Commissioner of Ontario (IPC) of this, no later than December 1st, 2017.
3. It is recommended that CCN ensure that its Business Continuity and Disaster Recovery Plan is tested in accordance with the frequency required by the Business Continuity and Disaster Recovery Plan.