

## 1. Organizational Privacy and Information Security Policy

Management of the Health Shared Services Ontario (HSSO), consisting of the Chief Executive Officer (CEO) and Senior Executives, hereby formally state their commitment to Information Security, Privacy, and the Information Security Management System (ISMS) being implemented throughout the enterprise, and that it is HSSO Policy to:

### General:

- Add considerable value to the Community Care Access Centres (CCAC) by providing secure operations and offering expertise in Privacy and Information Security.
- Always adhere to, and to be seen to adhere to, the highest level of care while handling Personal Health Information (PHI).
- Demand individual accountability for unauthorized or inappropriate use, access, disclosure, destruction, modification, or interference with the normal operations and data flows of any service offered or owned by the HSSO. Any person, whom violates this policy, including full-time employees, or contractors, may be disciplined up to and including immediate dismissal or termination of contract.
- Establish policies, procedures, and guidelines that will enable safeguards around PHI or other personal or confidential information, and ensure that the HSSO adheres with Personal Health Information Protection Act (PHIPA) legislation and principles.
- Establish and support an Information Security Management System (ISMS) that adheres to well-known standards and best practices and also identifies information security goals and reporting that align with business requirements.

## Organizational Privacy and Information Security Policy

**Classification: Public**

### Privacy:

- Comply with applicable legislation regarding PHI and Personal Information (PI), i.e. Personal Health Information Protection Act (PHIPA), Freedom of Information and Protection of Privacy Act (FIPPA).
- Collectively and individually apply the ten Canadian Standards Act (CSA) Privacy Principles to the information and services we provide.
- Ensure that all agents and third party providers are held to the same or greater standards for the privacy and information security of HSSO and CCAC information as is required by PHIPA.

### Security:

- Show active and clear support for the principles of Information Security: confidentiality, integrity, and availability.
- Ensure the confidentiality, integrity, and availability of the information and systems that we are the custodians, operators, or agents of.

## 2. Terminology

- PRISM - Privacy, Risk and Information Security Management
- ISMS – Information Security Management System. The ISMS is the set of all policies, procedures, guidelines, and services that the organization will develop and use to assess risks and to implement mitigation.
- ISP – Information Security Program. Any and all staff or resources, as directed by the Director of Information Technology, whom are responsible for designing, implementing, or running the ISMS.
- CIA – Confidentiality, Integrity, and Availability. These are the three core principles of Information Security.
- PHI – Personal Health Information. Information that both identifies an individual (by name, address, health card number, etc.) and contains health related information.
- PI – Personal Information. Information that can uniquely identify a person
- PHIPA – Personal Health Information Protection Act. This act outlines privacy regulations for health information custodians in Ontario.
- FIPPA - Freedom of Information and Protection of Privacy Act. This act provides a right of access to information in the custody or under the control of institutions subject to the Act and, provides a right to the protection of personal information under the custody or control of the institution.