
Privacy Impact Assessments



PRIVACY IMPACT ASSESSMENT REQUIREMENTS

Requirements

Privacy Impact Assessment Requirements can be found at:

<https://www.oipc.ab.ca/action-items/privacy-impact-assessments.aspx>

https://www.oipc.ab.ca/media/615916/Guide_PIA_Requirements_2010.pdf

Who?

Custodians (including, but not limited to):

- **Dentists**
- **Dental Hygienists**
- **Denturists**
- Physicians
- Registered Nurses
- Chiro's, Podiatrists, Opticians, etc.

Affiliates

Information Managers

Why?

Under the HIA, submission of your **PIA** to the Office of the Information and Privacy Commissioner (OIPC) is **mandatory** and **must precede implementation of your new system or practice.**

Section 64 of the *Health Information Act* mandates PIA's for all custodians.

Note: PIAs submitted by custodians under the *Health Information Act* must follow the instructions and format set out in the OIPC PIA Requirements. If you fail to do so, your PIA may be returned by the OIPC.

Requirements (When?)

The PIA is to review the **impact a project may have on individual privacy**. The process is also designed to ensure that you **assess your project's compliance** with relevant legislation.

The **PIA is a due diligence exercise**, in which you identify and address potential privacy risks that may occur in the course of your operations.

The PIA process requires a **thorough analysis** of potential **impacts to privacy** and a consideration of reasonable measures to mitigate these impacts.

PIAs are focused on specific projects, the process **must also include an examination of organization-wide practices** that have an impact on privacy.

Your **policies and procedures**, affect your ability to ensure privacy protecting measures.

What and Where: Information for a PIA

What

- Documents
- Agreements
- Processes
- Procedures
- Listing of vendors, security, cleaning, shredding companies, etc.
- Listing of staff, duties and what is their access to info

Where

- Office / Dental Practice
- Remote / Satellite locations
- Vendors. Practice Management Solutions (i.e., Dentrix, Brightsquid)
- Laptop, computer systems
- Billing Agents, anyone who has access to (Health) Information

PIA - Format



- **COVER LETTER** The cover letter is a brief letter, addressed to the OIPC that introduces the PIA. It is signed by the custodian or their authorized representative.
- **COVER PAGE** The cover page provides basic information about the PIA and contact information for people involved in the PIA process.
- **SECTION A** Project Overview describes the project to be assessed.
- **SECTION B** Privacy Management addresses your overall management of privacy functions, including organizational structure and policies.
- **SECTION C** Project Privacy Analysis addresses privacy topics related to the specific project that is the subject of the PIA.
- **SECTION D** Project Privacy Risks and Mitigation Plans describes the privacy risks and mitigation measures you have identified for the project in question. This is a critical component of the PIA and should be completed in as much detail as possible.
- **SECTION E** Policy and Procedures Attachments provides a list of privacy and information security policies you need to attach to your submission. Policies and procedures specific to the project are also included in this section.

PIA - How

- Hire an expert
 - Saves **time**, money, frustration
 - Knowledgeable, experts in PIA's
 - <https://www.AlbertaPIA.ca>
- Review the Health Information Act, Health Regulations
- Download the information from ADA&C website
 - The ADA&C have resources on-line for Dentists to access
 - Provides a DIY option
- Download the OIPC Requirements

Privacy Contacts

Mark Eyre,
Director, Customer Operations & Privacy
Phone: 1-800-238-6503 x300
Email: mark@Brightsquid.com

