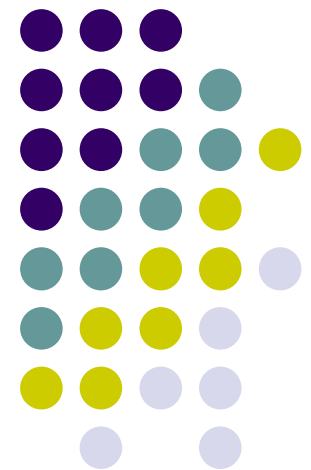
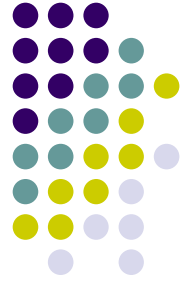


# Wrestling with Rogue Factions within Your Organization

## A Regional Health Authority Perspective

Dawn Lake  
Information Access & Privacy Consultant  
Palliser Health Region  
April 16<sup>th</sup>, 2007





## Who this may be:

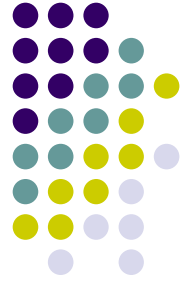
- New Clinical Programs/Services
- Regional Services being restructured
- Preexisting Programs, Departments or Services adding/changing their processes
- Provincial or Multi-Regional initiatives



# How do we find them

- A complaint from an individual
- In Education Session
- Pre-existing process that “flag” these Programs/Dept/Services and this opens Pandora's box.....
- The Friday 4:15 phone call ....”Hi I’m from \*\*\*\* and we are a new program that started up in the Region last month and I am just wondering....

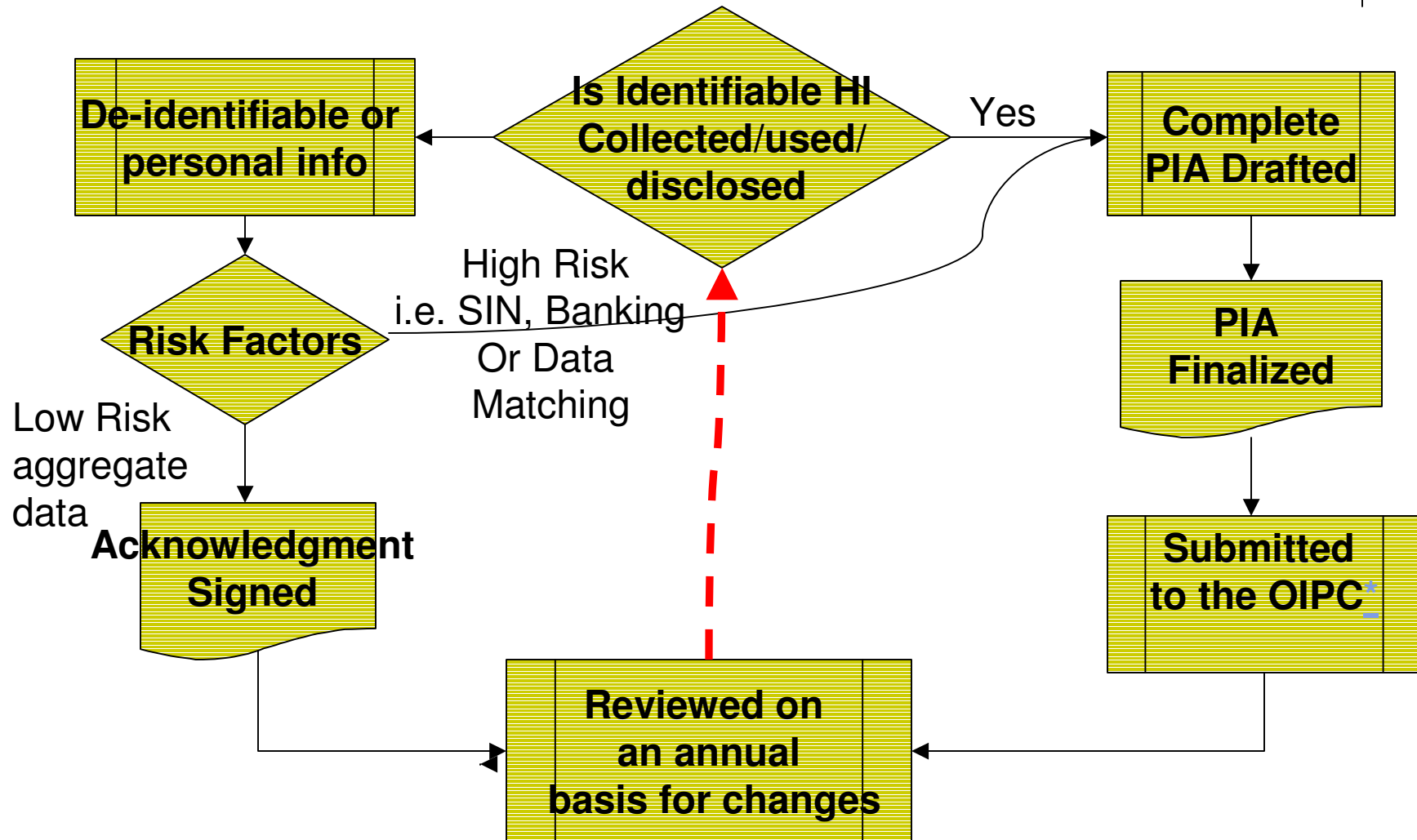
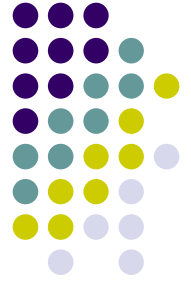
# So what next



In Palliser we initiate a process review of the program/department/service

- 1) A preliminary privacy assessment is completed.
- 2) Follow a patient and their information from referral through admission, treatment to discharge.
- 3) Determine the information and the persons that are collecting, using, disclosing, retaining and disposing.

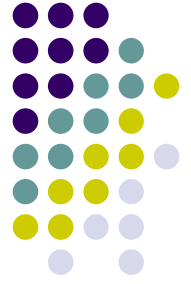
# Preliminary Privacy Assessment





## S. 64 of Alberta's HIA

Requires that the Office of the Information and Privacy Commissioner receive a privacy impact assessment for "*review and comment*" before a custodian implements "*proposed administrative practices and information systems relating to the collection, use or disclosure of individually identifying health information*".



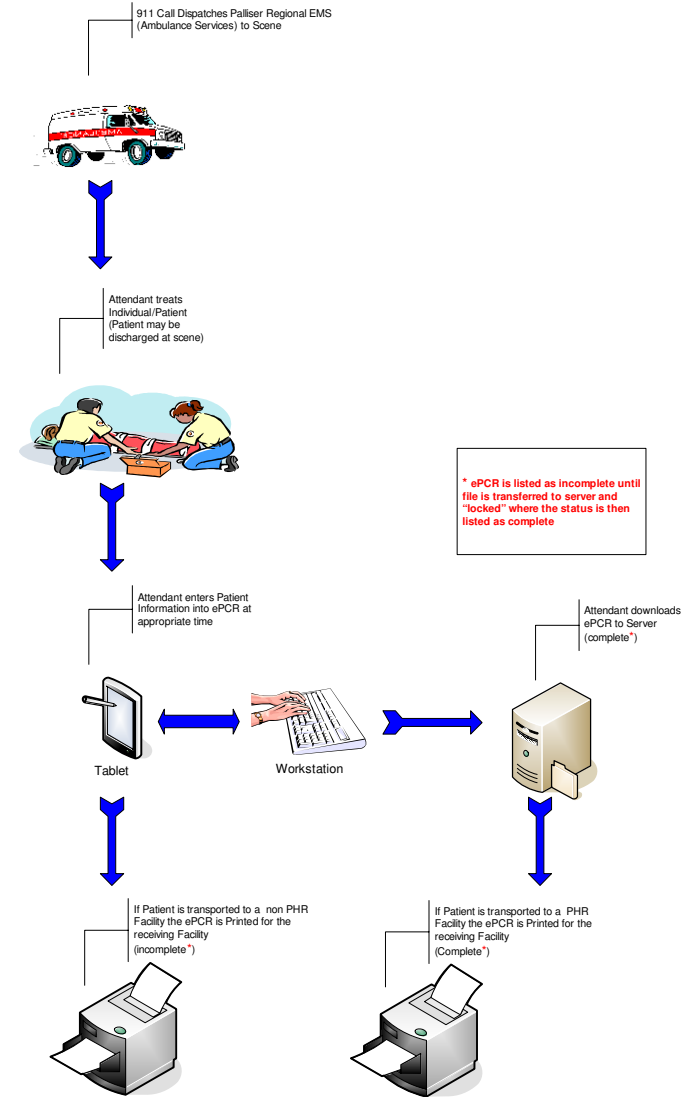
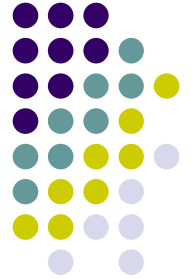
# Tools Utilized

- [Process/Flow Diagrams](#)
- [Software Request Process \(Developed by IMTS and IAPS\)](#)
- Risk Assessment Template developed by PHR Security Officer
- [PIA Template from the OIPC of Alberta](#)
- “Acknowledgment” developed by IAPS

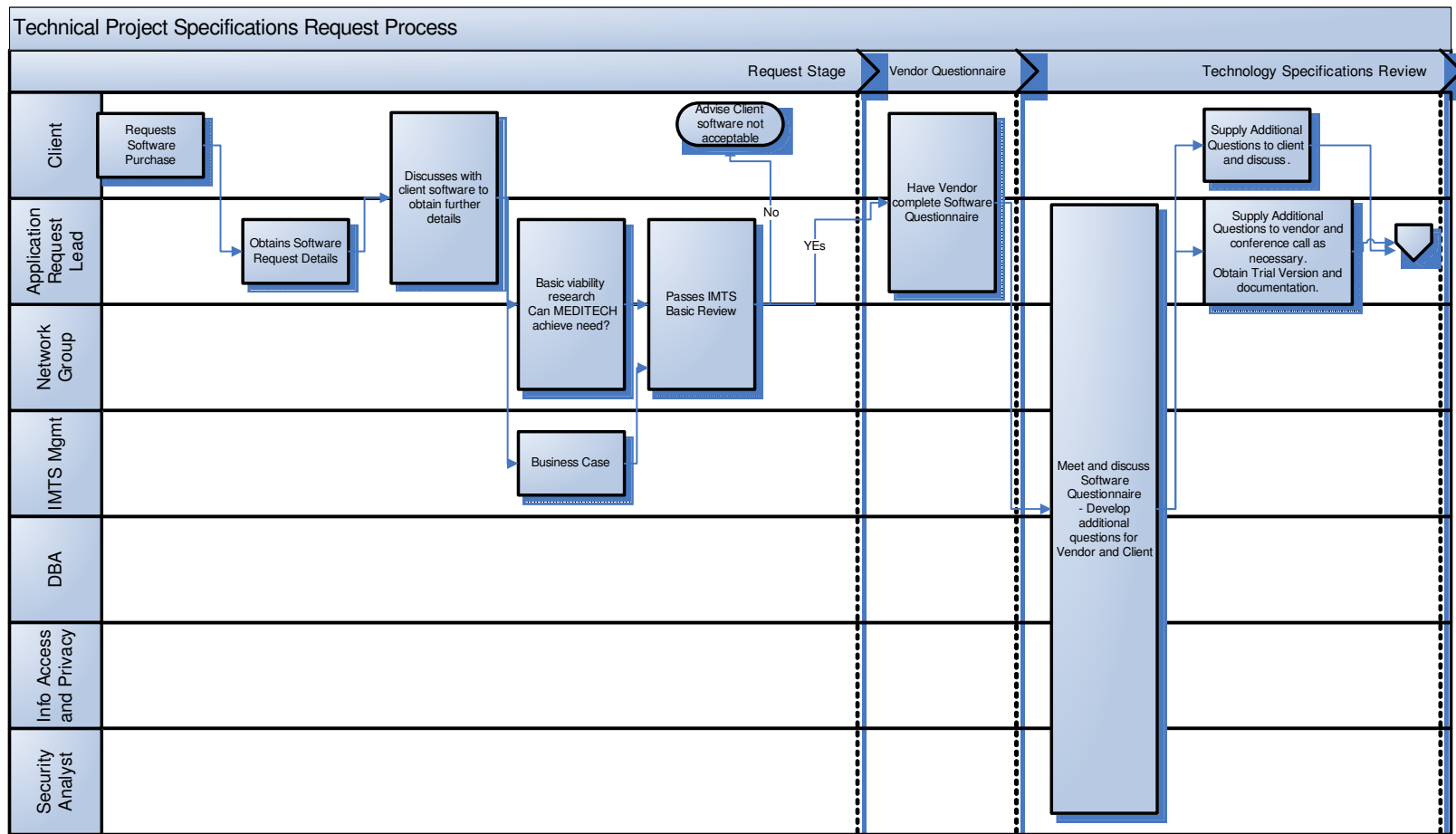
# Sample Information Flow Diagram



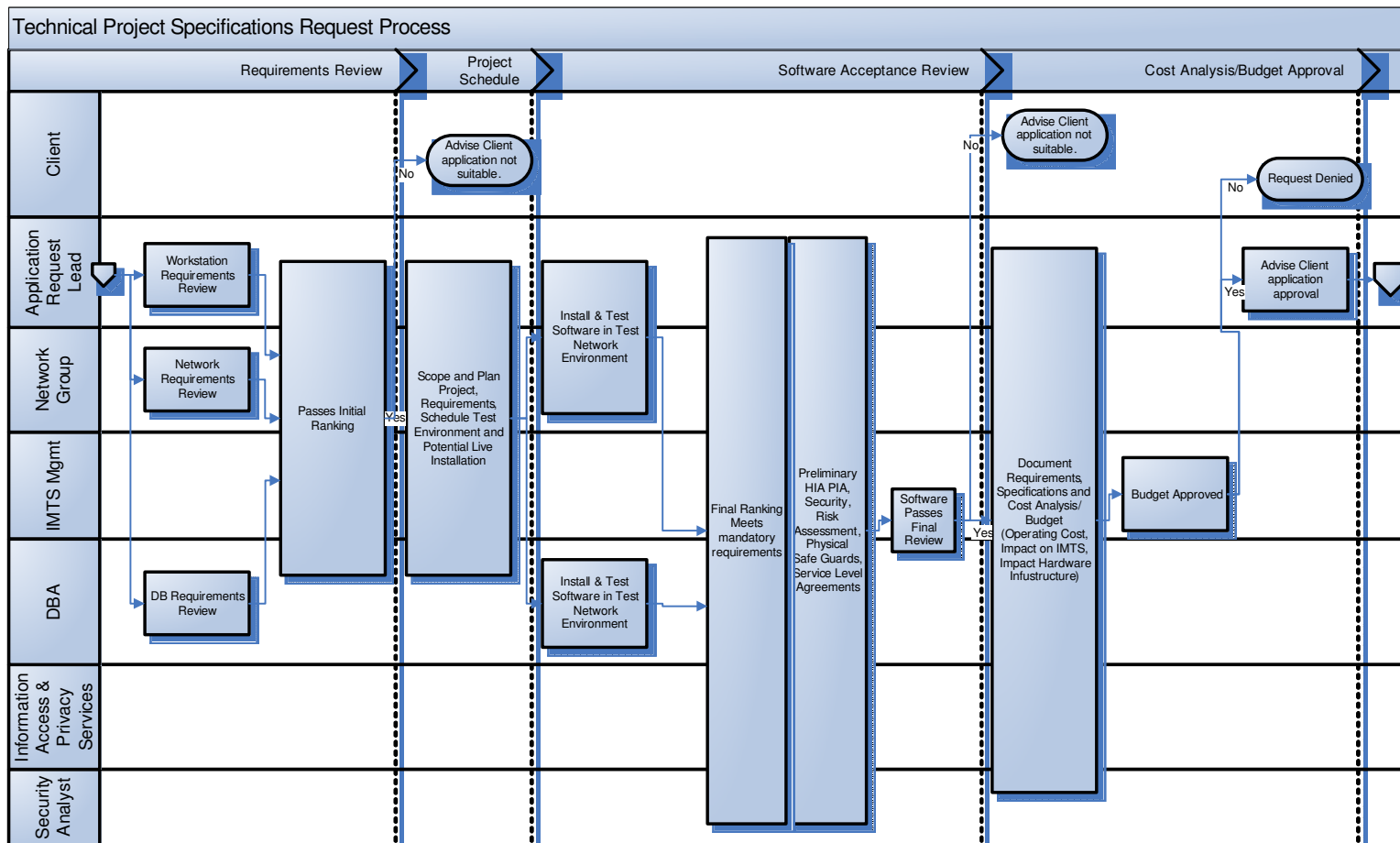
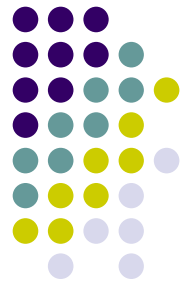
## Information Flow for Palliser Health Region Emergency Medical Services (Ambulance)



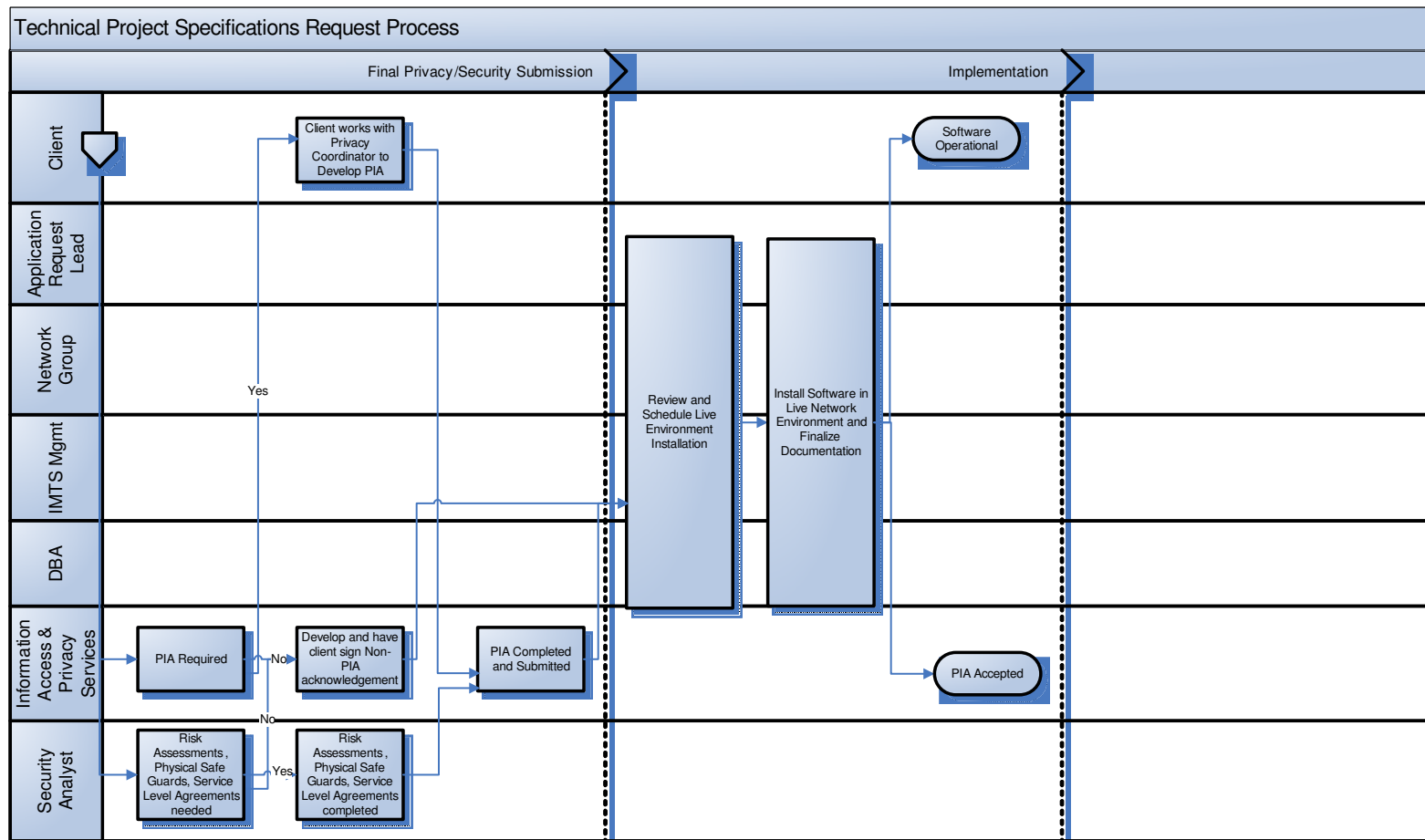
# Software Request Process con't



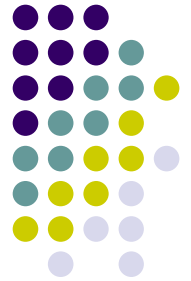
# Software Request Process con't



# Software Request Process con't



# Risk Assessment Template



The IMTS Risk Assessment process attempts to identify possible causes of loss of data from a system, assess the risk, and recommend steps to remediate the risk. The threats are according to the Palliser Network and the application within that network. The probability of occurrence rating is before any steps to mitigate such risks have been implemented. The Risk Mitigation is based on industry best practice or requirements under the applicable Legislation or Security Standards recommended by Alberta Health and Wellness.

# Risk Assessment Template



The Risk Assessment Process is a six step process as follows:

- Determine the type of data accessed by the system and rank that data according to Palliser's Information Classification Scheme.
- Identify the most common risk factors (Threats) for the system.
- Estimate probability of negative event due to risk factor.
- Asses the Impact Rating before remediation.
- Calculate a quantitative assessment of the Risk Rating, before remediation, by multiplying the Probability Rating by the Impact.
- Risk Mitigation indicated.

# How are the Rouge Factions Handled.....



- Reminded of the process (via email, articles and in face-to face management meetings)
- Support from Senior Executive
- Educated, Educated, Educated
- ....and finally a bit more education.