

EHN Outpatient Services Privacy Impact Assessment Summary

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Executive Summary

In accordance with Ontario Regulation 329/04 made under the Personal Health Information Protection Act, 2004 (PHIPA), the EHN Outpatient Services team has completed a Privacy Impact Assessment (PIA) for EHN Outpatient Services Version 3.0.

EHN Outpatient Services provides online mental health and addiction treatment, counselling, and aftercare services to individuals. The Wagon system provides both online therapy and the Wagon mobile recovery app to help individuals suffering from mental health and addiction disorders achieve long-term recovery. The Wagon app is a companion tool with a library of tools to help clients on a daily basis. The Wagon app is both a client monitoring tool for counsellors, as well as a daily recovery support tool for clients.

This summary reflects the findings and recommendations from the second PIA conducted for EHN Outpatient Services Version 3.0. The PIA was conducted based on the guidelines recommended by the Office of the Privacy Commissioner of Canada, which incorporates the ten principles of the Canadian Standards Association Model Code for assessing fair information handling practices.

Privacy Principles

The findings and recommendations relating to potential privacy risks for EHN Outpatient Services 3.0 are presented in a framework consistent with the ten privacy principles of the CSA Model Code for assessing fair information handling practices.

Principle 1: Accountability

Compliance status: Full

Recommendations for risk mitigation:

- None

Principle 2: Identifying Purposes

Compliance status: Full

Recommendations for risk mitigation:

- None

Principle 3: Consent

Compliance status: Full

Recommendations for risk mitigation:

- None

Principle 4: Limiting Collection

Compliance status: Full

Recommendations for risk mitigation:

- None

Principle 5: Limiting Use, Disclosure, and Retention

Compliance status: Full

Recommendations for risk mitigation:

- None

Principle 6: Accuracy

Compliance status: Partial

Recommendations for risk mitigation:

- Develop policies and procedures for monitoring and evaluating Wagon user audit logs.

Principle 7: Safeguards

Compliance status: Partial

Recommendations for risk mitigation:

- Configure Azure to monitor and report on inappropriate system use.
- Develop and document a policy for monitoring and responding to inappropriate system use.

Principle 8: Openness

Compliance status: Full

Recommendations for risk mitigation:

- None

Principle 9: Individual Access

Compliance status: Full

Recommendations for risk mitigation:

- None

Principle 10: Challenging Compliance

Compliance status: Full

Recommendations for risk mitigation:

- None