Privacy and Security at CIHI

DPPS 2018 – Cal Marcoux

Canadian Institute for Health Information

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CIHI: A trusted partner

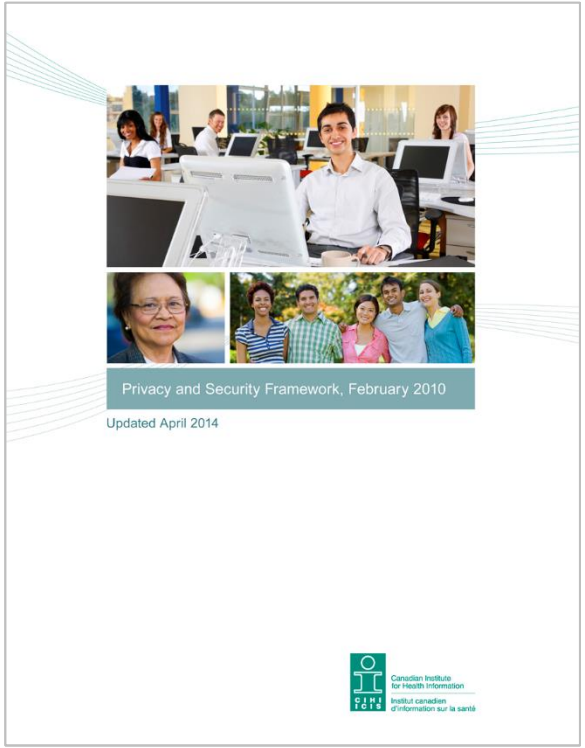
CIHI

CIHI's Privacy and Security Program

- **Maintains the trust and confidence of stakeholders**
- **Protects individual privacy, the confidentiality of records and the security of information**

CIHI's Privacy and Security Framework

Available at www.cihi.ca



CIHI

Key Privacy & Security Program Components

- **Privacy and security risk management**
- **Governance framework**
- **Policies, procedures and standards**
- **Secure Information Lifecycle**
- **Cybersecurity program**
- **Management Processes include;**
  - Training and awareness, Audit & Assessment, Incident Management, Monitoring & Reporting, Continual Improvement

Privacy & Security risk management

- **Risk Management is a formal, repeatable process to identify, assess, treat and monitor privacy and security risks**

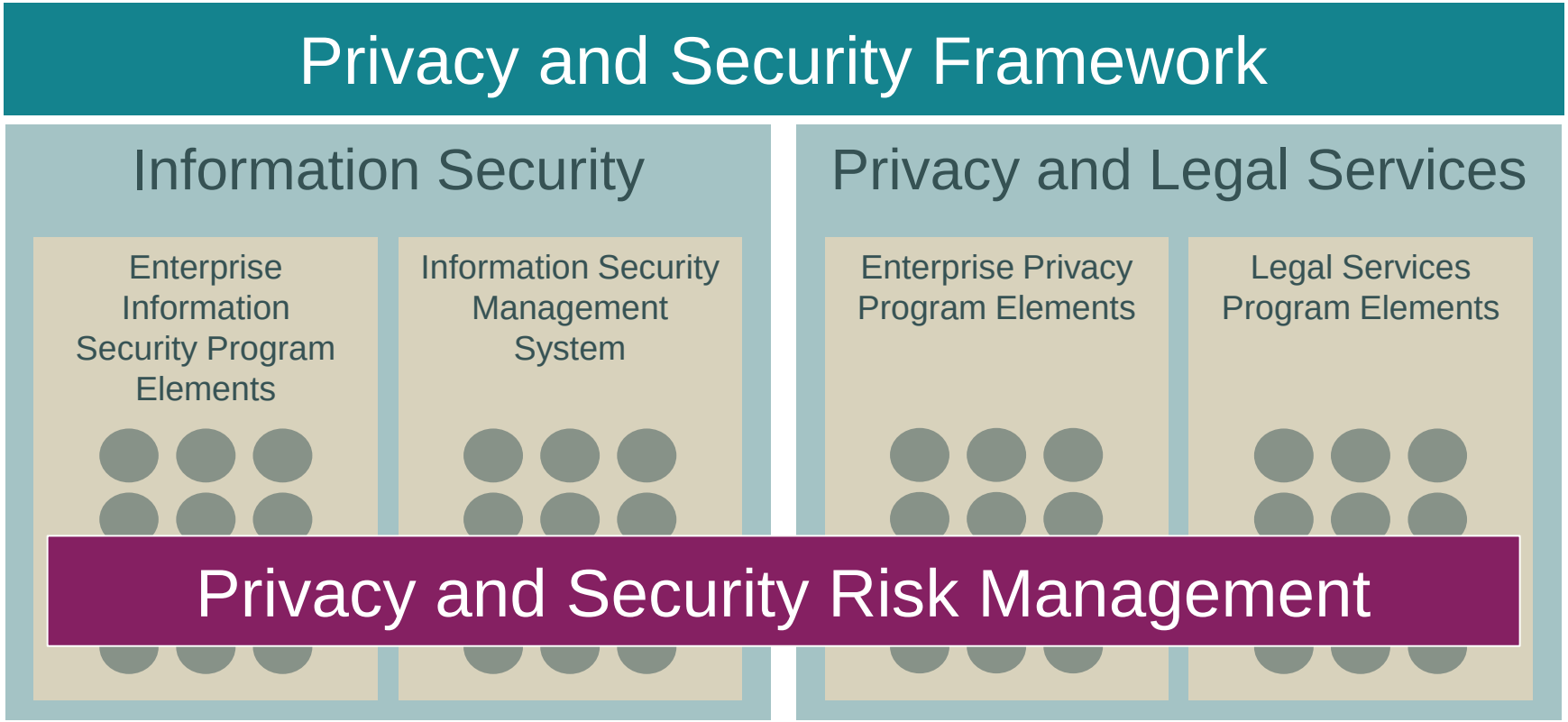
  Information Security Risk Management

  -> Privacy & Security Risk Management

  -> Corporate Risk Management

- **Recognition that risk exists – it's better to manage it than to be afraid of it**
- **Risk Management is embedded in everything we do**

Privacy and Security Risk Management IN CONTEXT



CIHI

Governance Framework

- **Board committees** provide oversight to the privacy and security programs
- **Chief Privacy Officer & General Counsel** responsible for Privacy
- **Chief Information Security Officer** responsible for information security

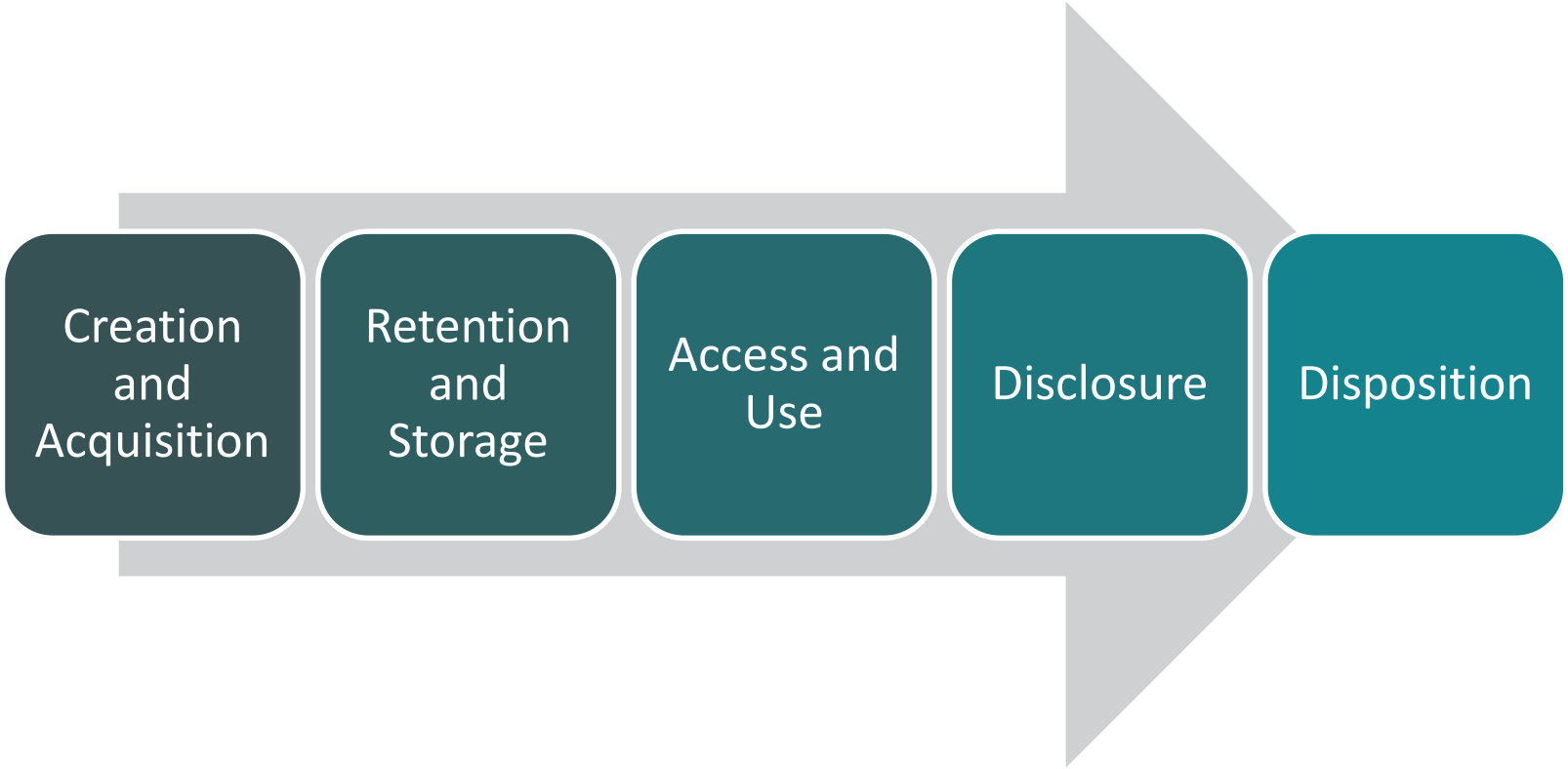
Policies, procedures and standards

Examples

- ***Privacy Policy on the Collection, Use, Disclosure and Retention of Personal Health Information and De-Identified Data***
- ***Information Security Policy***
- ***Privacy and Security Incident Management Protocol***
- ***Privacy Impact Assessment Policy***
- ***Privacy and Security Risk Management Framework***

All available at www.cihi.ca

Secure information lifecycle

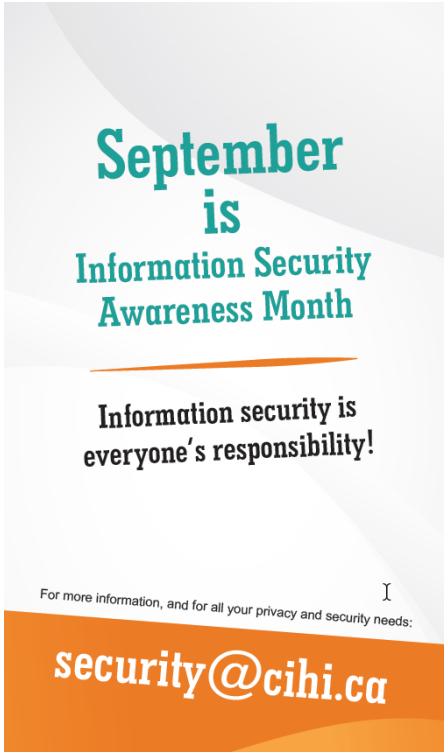


Cybersecurity Program

Key cybersecurity components include;

- **Perimeter monitoring and protection**
- **Endpoint monitoring and protection**
- **Antivirus, antimalware**
- **Authentication**
- **Encryption**

Training and awareness: CIHI's culture of privacy and security



CIHI's staff are made aware of the importance of maintaining the confidentiality of personal health information and other sensitive information through mandatory privacy and security training and through ongoing communications about issues that may impact privacy and security at CIHI.

Audit and assessment - External review of CIHI's Privacy and Security Program

- **Prescribed entity under Ontario's *Personal Health Information Protection Act* (PHIPA)**
- **CIHI maintains International Organization for Standards (ISO) 27001: 2013 certification**

Audit and assessment – internal audit

- **Privacy audit program**
  - Program area audits
  - Topic audits
  - Data recipient audits
  - PIAs
- **Information Security audit program**
  - Vulnerability assessments, “ethical hacks”
  - Data access audits
  - Ad hoc audits

Incident Management

- Privacy and Security Incident Management Protocol allows CIHI to identify, manage and resolve privacy and information security incidents and breaches.
- An incident is any event that;
  - Affects or has the potential to affect the confidentiality, integrity or availability of CIHI's information assets
  - Compromises or has the potential to compromise CIHI's information security controls
  - May result in unauthorized use, access, copying, modification, disclosure or disposal of CIHI's information assets.
- All staff are expected to report all actual, suspected or potential incidents

Monitoring & Reporting

- **Ongoing monitoring of information security controls with monthly metrics and key performance indicators**
- **Monitoring of external environment**
  - Threat/risk landscape
  - Relevant legislative and regulatory developments
- **Management review of Information Security Management System and Privacy & Security Risk Management Program on an annual basis**

Continual Improvement

- **Privacy & Legal Services and Information Security collaborate daily and identify improvements through:**
  - Program reviews
  - Incident management activities
  - Risk management activities
  - Proactive engagement of staff and governance bodies

If you could choose only 5 controls….

“Top 5” critical data protection controls:

1. **Encryption of personal information**
2. **Patch management for all systems/software**
3. **Staff awareness – especially for phishing and other social engineering**
4. **Access management – respect the need-to-know principle**
5. **Data minimization – only collect, store, use data that is required for the purpose at hand**


Questions?

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