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## Appendix C: Privacy, Security, Human Resources and Organizational Indicators

Special Note: For this Indicators document, POGO has included some information beyond POGO’s activities under s.45 of PHIPA. These activities relate to our consent-based PHI data holdings, specifically the POGO Financial Assistance Program database; POGO Interlink Nursing Program database; and the POGO School and Work Transitions Program Database.

### Part 1 – Privacy Indicators

#### General Privacy Policies, Procedures & Practices

Privacy Indicator	Assessment
The dates that the privacy policies and procedures were reviewed by the prescribed person or prescribed entity since the prior review of the Information and Privacy Commissioner of Ontario.	<p>General privacy policies and procedures were reviewed, updated, and communicated.</p> <p>For details, see <a href="#">Section A: Part 1 – Privacy Indicators: Record of Reviews and Updates to General Privacy Policies &amp; Procedures</a>.</p>
Whether amendments were made to existing privacy policies and procedures as a result of the review, and if so, a list of the amended privacy policies and procedures and, for each policy and procedure amended, a brief description of the amendments made.	
Whether new privacy policies and procedures were developed and implemented as a result of the review, and if so, a brief description of each of the policies and procedures developed and implemented.	
The date that each amended and newly developed privacy policy and procedure was communicated to agents and, for each amended and newly developed privacy policy and procedure communicated to agents, the nature of the communication.	
Whether communication materials available to the public and other stakeholders were amended as a result of the review, and if so, a brief description of the amendments.	

#### Collection

Privacy Indicator	Assessment
The number of data holdings containing personal health information maintained by the prescribed person or prescribed entity.	<p>Number of data holdings containing PHI: 7</p> <ul style="list-style-type: none"> <li>• POGONIS (Pediatric Oncology Group of Ontario Networked Information System);</li> <li>• POGO Financial Assistance Program;</li> <li>• POGO Interlink Nursing Program Database;</li> <li>• The POGO School and Work Transitions Program Database;</li> <li>• ACTS (After Care Treatment Summary) Database;</li> <li>• Satellite Database;</li> <li>• POGO AfterCare Program Database.</li> </ul>
The number of statements of purpose developed for data holdings containing personal health information.	Each of the 7 data holdings has a statement of purpose.
The number and a list of the statements of purpose for data holdings containing	All 7 statements of purpose for the data holdings have been reviewed since the last

personal health information that were reviewed since the prior review by the Information and Privacy Commissioner of Ontario.	IPC review.
Whether amendments were made to existing statements of purpose for data holdings containing personal health information as a result of the review, and a list of the amended statements of purpose and, for each statement of purpose amended, brief description of the amendments made.	Number of PHI data holding statements of purpose amended: 3  See <a href="#">Section B</a> : Amended Statements of Purpose for Data Holdings.

## Use

Privacy Indicator	Assessment
The number of agents granted approval to access and use personal health information for purposes other than research.	Number of agents granted approval to access and use PHI (for purposes other than research): 111
The number of requests received for the use of personal health information for research since the prior review by the Information and Privacy Commissioner of Ontario.	Total requests for use of PHI (research) received: 4
The number of requests for the use of personal health information for research purposes that were granted and that were denied since the prior review by the Information and Privacy Commissioner of Ontario.	Total requests for use of PHI (research) granted: 4 Total requests for use of PHI (research) denied: 0

## Disclosure

Privacy Indicator	Assessment
The number of requests received for the disclosure of personal health information <b>for purposes other than research</b> since the prior review by the Information and Privacy Commissioner of Ontario.	Number of PHI disclosure requests (non-research) received: 336
The number of requests for the disclosure of personal health <b>information for purposes other than research</b> that were granted and that were denied since the prior review by the Information and Privacy Commissioner of Ontario.	Number of PHI disclosure requests (non-research) granted: 336 Number of PHI disclosure requests (non-research) denied: 0
The number of requests for the disclosure of personal health information <b>for research purposes</b> that were granted and that were denied since the prior review by the Information and Privacy Commissioner of Ontario.	Number of PHI disclosure requests (research) granted: 2 Number of disclosure requests (research) denied: 0
The number of Research Agreements executed with researchers to whom personal health information was disclosed since the prior review by the Information Privacy Commissioner of Ontario.	Number of Research Agreements executed with researchers to whom PHI was disclosed: 2
The number of requests received for the <b>disclosure of de-identified and/or aggregate information for both research</b>	Number of requests for de-identified and/or aggregate information received: 48

<b>and other purposes</b> since the prior review by the Information and Privacy Commissioner of Ontario.	
The number of acknowledgements or agreements executed by persons to whom <b>de-identified and/or aggregate information was disclosed for both research and other purposes</b> since the prior review by the Information and Privacy Commissioner of Ontario.	Number of acknowledgements or agreements executed by persons to whom de-identified and/or aggregate information was disclosed: 48

### Data Sharing Agreements

Privacy Indicator	Assessment
The number of Data Sharing Agreements executed for the collection of personal health information by the prescribed person or prescribed entity since the prior review by the Information and Privacy Commissioner of Ontario.	<ul style="list-style-type: none"> <li>No new Data Sharing Agreements have been executed for the purposes of collection since the prior review by the IPC.</li> <li>There have been 7 Data Sharing Agreements for the collection of personal health information amended since the prior review.</li> </ul>
The number of Data Sharing Agreements executed for the disclosure of personal health information by the prescribed person or prescribed entity since the prior review by the Information and Privacy Commissioner of Ontario.	<ul style="list-style-type: none"> <li>No new Data Sharing Agreements executed for the disclosure of PHI since the prior review by the IPC.</li> <li>There have been 2 Data Sharing Agreements for the disclosure of PHI amended since the prior review by the IPC.</li> </ul>

### Agreements with Third-Party Service Providers

Privacy Indicator	Assessment
The number of agreements executed with third party service providers with access to personal health information since the prior review by the Information and Privacy Commissioner of Ontario.	<ul style="list-style-type: none"> <li>Number of agreements executed with third party service providers: 2</li> </ul>

### Data Linkage

Privacy Indicator	Assessment
The number and a list of data linkages approved since the prior review by the Information and Privacy Commissioner of Ontario.	<p>Number of data linkages approved : 22</p> <ul style="list-style-type: none"> <li>Linkage between POGONIS and Positron Emission Tomography scanning data acquired from Ontario Health: 20</li> <li>Linkage between POGONIS and Ontario Health's Ontario Cancer Registry (Death Clearance and Second Cancers): 2 (September 2020; September 2021).</li> </ul>

## PIA Assessments

Privacy Indicator	Assessment
<p>The number and a list of privacy impact assessments completed since the prior review by the Information and Privacy Commissioner of Ontario and for each privacy impact assessment:</p> <ul style="list-style-type: none"> <li>• The data holding, information system, technology or program,</li> <li>• The date of completion of the privacy impact assessment,</li> <li>• A brief description of each recommendation,</li> <li>• The date each recommendation was addressed or is proposed to be addressed, and</li> <li>• The manner in which each recommendation was addressed or is proposed to be addressed.</li> </ul>	<p>Number of PIAs completed: 11</p> <p>See <a href="#">Section C</a> for a list and details.</p>
<p>The number and a list of privacy impact assessments undertaken but not completed since the prior review by the Information and Privacy Commissioner and the proposed date of completion.</p>	<p>Privacy impact assessments undertaken but not completed since the prior review: 0</p>
<p>The number and a list of privacy impact assessments that were not undertaken but for which privacy impact assessments will be completed and the proposed date of completion.</p>	<p>Privacy impact assessments planned but not undertaken: 0</p>
<p>The number of determinations made since the prior review by the Information and Privacy Commissioner of Ontario that a privacy impact assessment is not required and, for each determination, the data holding, information system, technology or program at issue and a brief description of the reasons for the determination.</p>	<p>PIAs were determined as not required for the following 4 POGO programs which do not collect, use or disclose personal health information:</p> <ul style="list-style-type: none"> <li>• Research Granting Program: This program invites proposals from external researchers for research funding and provides grants for selected applicants to carry out external research. No PHI is collected, used or disclosed during this granting process.</li> <li>• Supportive Care Guidelines Program: This program reviews and synthesizes scientific literature and publishes clinical practice guidance. No PHI is collected, used or disclosed for the purposes of this program.</li> <li>• Clinical Education Program: This program develops and presents educational programs consisting of invited expert speakers. No PHI is collected, used or disclosed during this process.</li> <li>• System Quality Improvement Initiatives: This work engages external stakeholders to provide advice on</li> </ul>

	<p>system quality improvement initiatives. This work does not involve collection, use or disclosure of PHI.</p> <p>PIAs were determined as not required for data holdings related to usual business processes such as finance, communications, and human resources.</p>
The number and a list of privacy impact assessments reviewed since the prior review by the Information and Privacy Commissioner and a brief description of any amendments made.	<p>Total number: 6</p> <p>See <a href="#">Section D</a> for a list and details.</p>

### Privacy Audit Program

Privacy Indicator	Assessment
<p>The dates of audits of agents granted approval to access and use personal health information since the prior review by the Information and Privacy Commissioner of Ontario and for each audit conducted:</p> <ul style="list-style-type: none"> <li>• A brief description of each recommendation made,</li> <li>• The date each recommendation was addressed or is proposed to be addressed, and</li> <li>• The manner in which each recommendation was addressed or is proposed to be addressed.</li> </ul>	<p>Total PHI agent/program audits: 38</p> <p>See <a href="#">Section E</a> for details.</p>
<p>The number and a list of all other privacy audits completed since the prior review by the Information and Privacy Commissioner of Ontario and for each audit:</p> <ul style="list-style-type: none"> <li>• A description of the nature and type of audit conducted,</li> <li>• The date of completion of the audit,</li> <li>• A brief description of each recommendation made,</li> <li>• The date each recommendation was addressed or is proposed to be addressed, and</li> <li>• The manner in which each recommendation was addressed or is proposed to be addressed.</li> </ul>	<p>Total other privacy audits: 11</p> <p>See <a href="#">Section F</a> for details.</p>

### Privacy Breaches

Privacy Indicator	Assessment
The number of notifications of privacy breaches or suspected privacy breaches received by the prescribed person or prescribed entity since the prior review by the Information and Privacy Commissioner of Ontario.	Number of notifications of privacy breaches or suspected privacy breaches: 4
<p>With respect to each privacy breach or suspected privacy breach:</p> <ul style="list-style-type: none"> <li>• The date that the notification was received,</li> </ul>	See <a href="#">Section G</a> for details.

<ul style="list-style-type: none"> <li>• The extent of the privacy breach or suspected privacy breach,</li> <li>• Whether it was internal or external,</li> <li>• The nature and extent of personal health information at issue,</li> <li>• The date that senior management was notified,</li> <li>• The containment measures implemented,</li> <li>• The date(s) that the containment measures were implemented,</li> <li>• The date(s) that notification was provided to the health information custodians or any other organizations,</li> <li>• The date that the investigation was commenced. The date that the investigation was completed,</li> <li>• A brief description of each recommendation made,</li> <li>• The date each recommendation was addressed or is proposed to be addressed, and</li> <li>• The manner in which each recommendation was addressed or is proposed to be addressed.</li> </ul>	
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**Privacy Complaints**

Privacy Indicator	Assessment
The number of privacy complaints received since the prior review by the Information and Privacy Commissioner of Ontario.	Number of privacy complaints received: 0
<p>Of the privacy complaints received, the number of privacy complaints investigated since the prior review by the Information and Privacy Commissioner of Ontario and with respect to each privacy complaint investigated:</p> <ul style="list-style-type: none"> <li>• The date that the privacy complaint was received,</li> <li>• The nature of the privacy complaint,</li> <li>• The date that the investigation was commenced,</li> <li>• The date of the letter to the individual who made the privacy complaint in relation to the commencement of the investigation,</li> <li>• The date that the investigation was completed,</li> <li>• A brief description of each recommendation made,</li> <li>• The date each recommendation was addressed or is proposed to be addressed,</li> <li>• The manner in which each recommendation was addressed or is proposed to be addressed, and</li> <li>• The date of the letter to the individual who made the privacy complaint</li> </ul>	Not applicable

describing the nature and findings of the investigation and the measures taken in response to the complaint.	
<p>Of the privacy complaints received, the number of privacy complaints not investigated since the prior review by the Information and Privacy Commissioner of Ontario and with respect to each privacy complaint not investigated:</p> <ul style="list-style-type: none"> <li>• The date that the privacy complaint was received,</li> <li>• The nature of the privacy complaint, and</li> <li>• The date of the letter to the individual who made the privacy complaint and a brief description of the content of the letter.</li> </ul>	Not applicable

## Part 2 – Security Indicators

### General Security Policies, Procedures & Practice

Security Indicators	Assessment
The dates that the security policies and procedures were reviewed by the prescribed person or prescribed entity since the prior review of the Information and Privacy Commissioner of Ontario.	<p>General security policies and procedures were reviewed, updated and communicated.</p> <p>For details, see <a href="#">Section H</a>: Part 2 – Security Indicators: Record of Reviews and Updates to General Privacy Policies &amp; Procedures.</p>
Whether amendments were made to existing security policies and procedures as a result of the review and, if so, a list of the amended security policies and procedures and, for each policy and procedure amended, a brief description of the amendments made.	
Whether new security policies and procedures were developed and implemented as a result of the review, and if so, a brief description of each of the policies and procedures developed and implemented.	
The dates that each amended and newly developed security policy and procedure was communicated to agents and, for each amended and newly developed security policy and procedure communicated to agents, the nature of the communication.	
Whether communication materials available to the public and other stakeholders were amended as a result of the review, and if so, a brief description of the amendments.	No communication materials available to the public and other stakeholders were amended as a result of POGO’s review of General security policies and procedures.

### Physical Security

Security Indicator	Assessment
<p>The dates of audits of agents granted approval to access the premises and locations within the premises where records of personal health information are retained since the prior review by the Information and Privacy Commissioner and for each audit:</p> <ul style="list-style-type: none"> <li>• A brief description of each recommendation made,</li> <li>• The date each recommendation was addressed or is proposed to be addressed, and</li> <li>• The manner in which each recommendation was addressed or is proposed to be addressed.</li> </ul>	See <a href="#">Section I</a> for details.

### Security Audit Program

Security Indicator	Assessment
The dates of the review of system control and audit logs since the prior review by the Information and Privacy Commissioner of Ontario and a general description of the findings, if any,	See <a href="#">Section J</a> for details.

<p>arising from the review of system control and audit logs.</p>	
<p>The number and a list of security audits completed since the prior review by the Information and Privacy Commissioner of Ontario and for each audit:</p> <ul style="list-style-type: none"> <li>• A description of the nature and type of audit conducted,</li> <li>• The date of completion of the audit,</li> <li>• A brief description of each recommendation made,</li> <li>• The date that each recommendation was addressed or is proposed to be addressed, and</li> <li>• The manner in which each recommendation was addressed or is expected to be addressed.</li> </ul>	<p>See <a href="#">Section J</a> for details.</p>

### Information Security Breaches

Security Indicator	Assessment
<p>The number of notifications of information security breaches or suspected information security breaches received by the prescribed person or prescribed entity since the prior review by the Information and Privacy Commissioner of Ontario.</p>	<p>Number of notifications of information security breaches or suspected information security breaches received: 0</p>
<p>With respect to each information security breach or suspected information security breach:</p> <ul style="list-style-type: none"> <li>• The date that the notification was received,</li> <li>• The extent of the information security breach or suspected information security breach,</li> <li>• The nature and extent of personal health information at issue,</li> <li>• The date that senior management was notified,</li> <li>• The containment measures implemented,</li> <li>• The date(s) that the containment measures were implemented</li> <li>• The date(s) that notification was provided to the health information custodians or any other organizations,</li> <li>• The date that the investigation was commenced,</li> <li>• The date that the investigation was completed,</li> <li>• A brief description of each recommendation made,</li> <li>• The date each recommendation was addressed or is proposed to be addressed, and</li> <li>• The manner in which each recommendation was addressed or is proposed to be addressed.</li> </ul>	<p>Not applicable</p>

## Part 3 – Human Resources Indicators

### Privacy and Security Training and Awareness

Human Resources Indicators	Assessment
<p>The number of agents who have received and who have not received initial privacy and security orientation since the prior review by the Information and Privacy Commissioner of Ontario.</p>	<p>Number of agents who received initial privacy and security orientation: 55</p> <p>2019 (November/December): 1 agent received initial privacy and security orientation</p> <p>2020: 10 agents received initial privacy and security orientation</p> <p>2021: 16 agents received initial privacy and security orientation</p> <p>2022: 28 agents received initial privacy and security orientation</p> <p>Number of agents who have not received initial privacy and security orientation: 0</p>
<p>The date of commencement of the employment, contractual or other relationship for agents that have yet to receive initial privacy and security orientation and the scheduled date of the initial privacy and security orientation.</p>	<p>Not applicable</p>
<p>The number of agents who have attended and who have not attended ongoing privacy and security training each year since the prior review by the Information and Privacy Commissioner of Ontario.</p>	<p>2019 (November/December): 0 agents received ongoing privacy and security training as all required annual training completed earlier in the year.</p> <p>2020: 90 agents received ongoing privacy and security training. 0 agents did not receive training.</p> <p>2021: 123 agents received ongoing privacy and security training. 0 agents did not receive training.</p> <p>2022: 109 agents received ongoing privacy and security training. 0 agents did not receive training.</p>
<p>The dates and number of communications to agents by the prescribed entity in relation to privacy and security since the prior review by the Information and Privacy Commissioner of Ontario and a brief description of each communication.</p>	<p>In addition to the communications sent for new and amended policies for Privacy, Security, Human Resources, and Organizational, the Privacy program provided an additional 68 communications which are noted in the section link below:</p> <p style="text-align: center;">See <a href="#">Section K</a> for details.</p>

### Confidentiality Agreements

Human Resources Indicators	Assessment
The number of agents who have executed and who have not executed Confidentiality Agreements each year since the prior review by the Information and Privacy Commissioner of Ontario.	<ul style="list-style-type: none"> <li>• 10 agents executed Confidentiality Agreements in November/December 2019</li> <li>• 77 agents executed Confidentiality Agreements in 2020</li> <li>• 136 agents executed Confidentiality Agreements in 2021</li> <li>• 116 agents executed Confidentiality Agreements in 2022               <ul style="list-style-type: none"> <li>○ (100% compliance)</li> </ul> </li> </ul>
The date of commencement of the employment, contractual or other relationship for agents that have yet to execute the Confidentiality Agreement and the date by which the Confidentiality Agreement must be executed.	<ul style="list-style-type: none"> <li>• None</li> </ul>

### Termination or Cessation

Human Resources Indicator	Assessment
The number of notifications received from agents since the prior review by the Information and Privacy Commissioner of Ontario related to termination of their employment, contractual or other relationship with the prescribed person or prescribed entity.	Number of notifications of terminations of employment, contractual or other relationship: 19

## Part 4 – Organizational Indicators

### Risk Management

Organizational Indicator	Assessment
The dates that the corporate risk register was reviewed by the prescribed person or prescribed entity since the prior review by the Information and Privacy Commissioner of Ontario.	The dates the corporate risk register was reviewed: <ol style="list-style-type: none"> <li>September 10, 2020</li> <li>September 9, 2021</li> <li>November 22, 2021</li> </ol>
Whether amendments were made to the corporate risk register as a result of the review, and if so, a brief description of the amendments made.	No amendments were made to the corporate risk register relating to the collection, use and disclosure of personal health information.

### Business Continuity & Disaster Recovery

Organizational Indicator	Assessment
The dates that the business continuity and disaster recovery plan was tested since the prior review by the Information and Privacy Commissioner of Ontario.	<ul style="list-style-type: none"> <li>March 16, 2020</li> <li>October 27, 2021</li> <li>June 23, 2022</li> <li>July 8, 2022</li> </ul>
Whether amendments were made to the business continuity and disaster recovery plan as a result of the testing, and if so, a brief description of the amendments made.	<p><b>March 2020</b></p> <ul style="list-style-type: none"> <li>Updated Appendix G.a.: Phone Tree.</li> <li>Updated frequency Program Managers are required to update program contact lists.</li> </ul> <p><b>October 2021</b></p> <ul style="list-style-type: none"> <li>Clarified staff member responsible for updating the contact List.</li> <li>Added: Emergency Succession &amp; Contingency Plan appendix to address unplanned absences in key roles.</li> <li>Updated Process for Identifying and Declaring a Business Interruption to reflect hybrid work model.</li> </ul> <p><b>May/June 2022</b></p> <ul style="list-style-type: none"> <li>Phone tree was updated.</li> <li>Interruption Scenarios was reviewed and Added scenario to reflect hybrid (in-office/home) work model to Interruption Scenarios home working was added.</li> </ul> <p><b>July 2022</b></p> <ul style="list-style-type: none"> <li>Added new scenario to Interruption Scenarios to address circumstances when a major telecommunication provider's services are down.</li> </ul>

**Section A – Part 1 – Privacy Indicators: Records of Reviews and Updates to Privacy Policies & Procedures**

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
Policy 1.7	Privacy and Data Security Code	Part 1 – Privacy Indicators General Privacy Policies Procedures & Practices	November 2020	November 2020	The following sections of POGO’s Privacy and Security Code (10 Principles) were updated: the names of the POGO Data Holdings; and definition for “Internal Agent”.	November 2020 – Privacy and Data Security Code document updated on POGO website. POGO Staff notified at January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO shared folder accessible by full team.	Amended Privacy and Data Security Code posted on the Privacy page on the POGO <a href="#">website</a> .
			June 2022	July 2022	The following sections of POGO’s Privacy and Security Code (10 Principles) were updated: the description and purpose statements of the POGO Data Holdings; under Principle: Consent included the requirement to obtain consent for POGO service delivery programs; updated POGO Senior Lead titles; and removal of Appendix A ( <i>POGO History and Case for Support</i> ).	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
Procedures 1.8	Privacy and Data Security Code	Part 1 – Privacy Indicators General	April 2022	July 2022	Updated POGO titles and roles; added reference to the	July 26, 2022 - POGO Staff Whiteboard	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
	<b>Procedures</b>	Privacy Policies Procedures & Practices			POGO Data Operations Committee, the Standard Operating Procedures and the Data Holding Cross-functional teams; added reference to the Re-identification Risk Assessment policy; removed of the terminated Confidentiality and Security of Data policy; added the privacy program email.	communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.1	<b>Process for 44 and 45 Projects</b>	Parts 1 – Privacy Indicators General Privacy Polices Procedures & Practices	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act</i> , 2004 (PHIPA) and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
9.1.2	Review of Privacy and Security Policies and Procedures	Parts 1 – Privacy Indicators General Privacy Polices Procedures & Practices	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario’s <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.3	Transparency of Privacy Policies, Procedures and Practices	Parts 1 – Privacy Indicators General Privacy Polices Procedures & Practices	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario’s <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies.	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					agents definition.	Policy updated in POGO Public folder.	
9.1.4	Collection of Personal Health Information	Part 1 – Privacy Indicators General Privacy Policies Procedures & Practices	January 2020	January 2020	Updated SAVTI name to The POGO School and Work Transitions Program.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Updated to add definitions; criteria for collection approval; the manner and format decisions are communicated; and the agent responsible for decisions and communication.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.5	Data Holdings Containing Personal Health Information	Part 1 – Privacy Indicators General Privacy Policies Procedures & Practices	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
9.1.6	Levels of Access	Part 1 – Privacy	June 2020	June 2020	Updated POGO's		

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
	<b>Policy</b>	Indicators General Privacy Policies Procedures & Practices			requirement to review policies and procedures from annual to once prior to each scheduled IPC review.		
			June 2022	June 2022	No changes made.		
<b>9.1.7</b>	<b>Use of Personal Health Information for Research</b>	Part 1 – Privacy Indicators General Privacy Policies Procedures & Practices	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario’s <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.1.8</b>	<b>Disclosure of Personal Health Information for Purposes Other than Research</b>	Part 1 – Privacy Indicators General Privacy Policies Procedures & Practices	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within	July 26, 2022 - POGO Staff Whiteboard	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act</i> , 2004 (PHIPA) and update of agents definition.	communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.9	Disclosure of Personal Health Information for Research Purposes and the Execution of research Agreements	Part 1 – Privacy Indicators General Privacy Policies Procedures & Practices	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act</i> , 2004 (PHIPA) and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.10	Execution of Data Sharing Agreements	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.11	Template for Agreement with Third Party Service Providers	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			July 2020	July 2020	Updated definition of third party service provider; and updated the types of third party service providers POGO engages with.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	No changes made.		
9.1.12	Linkage of Records of Personal Health Information	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to	July 26, 2022 - POGO Staff	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act</i> , 2004 (PHIPA) and update of agents definition.	Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.13	De-Identified and Aggregate Personal Health Information	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added note to review policy in conjunction with POGO's Small Cell Policy and the new POGO Re-identification Risk Assessment Policy; added definitions section; updated the guidelines section; added which POGO agent/s are responsible for de-identifying data; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.14	Privacy Impact	Part 1 – Privacy	June 2020	June 2020	Updated POGO's	January 27, 2021 - POGO	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
	<b>Assessment</b>	Indicators General Privacy Policies Procedures & Policies			requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			March 2021	March 2021	Added formal Privacy Impact Assessment definition to Policy # 9.1.14 Privacy Impact Assessment.	January 28, 2022 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	April 2022	Added text to Internal Program Privacy Impact Assessment guidelines; inclusion of whether a PIA is required and logging of rationale.	April 12, 2022 – communication to POGO PHI Data Holding Managers of updated policy and PIA template to be completed for all PHI Data Holdings.	
<b>9.1.15</b>	<b>Privacy Audit</b>	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario’s <i>Personal Health Information Protection Act, 2004</i> (PHIPA) and update of	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies.	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					agents definition.	Policy updated in POGO Public folder.	
9.1.16	Privacy Breach and Incident Management	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	March 2020	March 2020	Updated SAVTI name to The POGO School and Work Transitions Program.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Updated definitions; added a review response; updated policy section; and updated the Flowchart for Notification and Action.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.17	Privacy Inquires, Challenges and Complaints	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
9.1.18	Access to Records by	Part 1 – Privacy	June 2020	June 2020	Updated POGO's	January 27, 2021 - POGO	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
	<b>the Public</b>	Indicators General Privacy Policies Procedures & Policies			requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
9.1.19	<b>Ethics Review Process for POGO</b>	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review. Update of Tri- Council Policy Statement link.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in <i>Ontario's Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.20	<b>Privacy and Security Policies for Ontario Telemedicine Network</b>	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
9.1.21	<b>Interlink Patient</b>	Part 1 – Privacy	June 2020	June 2020	Updated POGO's	January 27, 2021 - POGO	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
	<b>Care Plan</b>	Indicators General Privacy Policies Procedures & Policies			requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and updated agent/s definition and updated location of storage of monthly Interlink reports.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.1.22</b>	<b>POGO Financial Assistance Program</b>	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
<b>9.1.23</b>	<b>The POGO School and Work Transitions Program Mobile Phones and Personal Health Information</b>	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	January 2020	January 2020	Updated name from "SAVTI" to "The POGO School and Work Transitions Program"; Name change from "SAVTI Counsellors" to "POGO Counsellors".	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's	January 27, 2021 - POGO	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.1.24	POGO Visitor Sign-In	Part 1 – Privacy Indicators General Privacy Policies Procedures & Policies	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			July 2020	July 2020	Included new process for issuing and returning of visitor Identification badge.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder. July 8, 2022 – Special reminder communication to POGO Staff re: Visitor Sign-in and Visitor Identification	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
						required.	
9.3.1	Privacy and Security Training Policy	Part 3 – Human Records Indicators	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario’s <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.3.2	Confidentiality and Non-Disclosure Agreement	Part 3 – Human Records Indicators	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	April 2022	Addition of clause “agents agree not to disclose or provide access to any Information to any person who is not under a confidentiality obligation or	April 12, 2022- POGO Operations Committee notified of change in policy and procedure by CEO. Policy updated in POGO Public folder.	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					written confidentiality agreement”.		
9.3.3	Delegation of Roles and Responsibilities	Part 3 – Human Records Indicators	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	July 2022	Updated to remove Associate Privacy Officer position and to add new POGO positions/ roles – Director of Technology, Data and Analytics and Program Coordinator – Information Technology, Data, Analytics and Privacy.	July 5, 2022 – POGO Staff informed of new positions/roles via POGO Whiteboard Communication. Policy updated in POGO Public folder.	
9.3.4	Termination or Cessation of Employment or Contractual Relationship	Part 3 – Human Records Indicators	September 2020	September 2020	Included in policy the requirement for Privacy Officer notification if an agent goes on “leave of absence” or a “maternity leave”.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	April 2022	Updated POGO’s requirement to review policies and procedures from annual to once prior to each	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					scheduled IPC review.	updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.3.6	Disciplinary Action – Privacy Breach	Part 3 – Human Records Indicators	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	N/A- no amendments	No changes made.		
9.3.26	Remote Access	Part 3 – Human Records Indicators	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
9.3.33 NEW Policy	POGO Policy and Procedures for Committee Participation Agreement	Part 3 – Human Records Indicators	November 2020	November 2020	Developed new POGO Policy and Procedures for Committee Participation Agreement to include conflict of interest and confidentiality.	March 9, 2021 - POGO Operations Committee notified of change in policy and procedure by CEO. Policy updated in POGO Public folder.	
			April 2022	April 2022	Updated policy section and included templates for the Committee Participation	July 26, 2022 - POGO Staff Whiteboard communication by Privacy	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					Agreement.	Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.4.1	Privacy and Security Governance and Accountability Framework	Part 4: Organizational Indicators	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	N/A- no amendments	No changes made.		
9.4.3	Terms of Reference For Committees	Part 4: Organizational Indicators	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	June 2022	Added Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and update of agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
						Public folder.	
9.4.4	Corporate Risk Management Framework	Part 4: Organizational Indicators	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
	Corporate Risk Management (new title)		June 2022	July 2022	Updated title; added reference to Corporate Risk Register and Corporate Risk Framework (as an appendix); added definitions section; updated roles and responsibilities; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.4.6	Consolidated Log of Recommendations	Part 4: Organizational Indicators	June 2020	June 2020	Update POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			April 2022	N/A- no amendments	No changes made.		
9.4.7	Business Continuity and Disaster Recovery Plan	Part 4: Organizational Indicators	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					annual to once prior to each scheduled IPC review.	POGO Public folder.	
			April 2022	June 2022	Addition to Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and updated agent/s definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.4.10	Email	Part 4: Organizational Indicators	June 2020	June 2020	Update POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Updated definitions to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and updated agent/s definition; updated with rules relating to email that were previously outlined	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
					in Policy #9.2.15 (Acceptable Usage). That policy now refers directly to this policy.		
9.4.12	BCDR Essential Services & Filing Centrally	Part 4: Organizational Indicators	June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Addition to Definitions section to indicate all terms used within this policy have the same meaning as set out in Ontario's <i>Personal Health Information Protection Act, 2004 (PHIPA)</i> and updated agents definition.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	

**Section B – Amended Statements of Purpose for Data Holdings**

Data Holdings where Purpose Statements Amended	Reason for the Amendments	Brief Description of Amendments Made
POGO Financial Assistance Program Database	To provide more detail about the purpose of the data holding.	Updated to include statement “In additional to collecting and using PHI to deliver services, the Program collects and analyzes data to monitor its impact and plan future services.”
POGO School and Work Transitions Database	To provide more detail about the purpose of the data holding.	Updated to include statement “In additional to collecting and using PHI to deliver services, the Program collects and analyzes data to monitor its impact and plan future services.”
Satellite Database	To provide more detail about the purpose of the data holding.	Updated to include statement “The Satellite database provides standardized data for Program planning, evaluation and reporting.”

## **Section C – Privacy Impact Assessments**

**Technology (2)**

Name of Data Holding, Technology, Program or Initiative Reviewed	Date PIA completed or expected to be completed (MM/DD/YY)	Agent completing/ensuring the completion of the PIA	Summary of Risk Description	Summary of Recommendations	Agent(s) responsible for addressing each recommendation	Date Recommendation was addressed or expected to be addressed. (MM/DD/YYYY)	The manner each recommendation was or is expected to be addressed	Status
Zoom for Health Care Video Conferencing	September 3, 2020	Privacy Office	Absence of designated and restricted user accounts could lead to breach of information and inappropriate access to POGO meetings.	<ol style="list-style-type: none"> <li>1. Password protected user accounts for designated POGO staff.</li> <li>2. When staff terminate employment with POGO, passwords will be updated.</li> </ol>	Privacy Office	December 21, 2020	<ol style="list-style-type: none"> <li>1. Zoom guidance document created. POGO agents follow guidance document in setting up user accounts and passwords. Privacy policies and information management practices are in place and implemented and shared with POGO staff.</li> <li>2. At time of termination of employment, designated staff update passwords.</li> </ol>	Completed
			Absence of procedures to ensure	<ol style="list-style-type: none"> <li>1. Guidelines to be developed on how to</li> </ol>	Privacy Office	December 21, 2020	<ol style="list-style-type: none"> <li>1. POGO agents follow the POGO Zoom guidance</li> </ol>	Completed

Name of Data Holding, Technology, Program or Initiative Reviewed	Date PIA completed or expected to be completed (MM/DD/YY)	Agent completing/ensuring the completion of the PIA	Summary of Risk Description	Summary of Recommendations	Agent(s) responsible for addressing each recommendation	Date Recommendation was addressed or expected to be addressed. (MM/DD/YYYY)	The manner each recommendation was or is expected to be addressed	Status
			appropriate and secure set up of meetings could lead to breach of information.	appropriately set up meetings to include all processes for sending out of meeting invitations including password enabled meetings.			document in setting up meetings. Privacy policies and information management practices are in place and implemented and shared with POGO staff.	
			Unauthorized attendees entering meetings.  i.e. Non-invited guests (Zoom bombing); Non- invited guest (invitation shared without authorization).	1. Zoom host is responsible for accepting attendees and confirming unrecognized names and/or phone numbers.	Privacy Office	December 21, 2020	1. POGO agents follow the POGO Zoom guidance document in accepting and confirming attendees to meetings. Privacy policies and information management practices are in place and implemented and shared with POGO staff.	Completed

Name of Data Holding, Technology, Program or Initiative Reviewed	Date PIA completed or expected to be completed (MM/DD/YY)	Agent completing/ensuring the completion of the PIA	Summary of Risk Description	Summary of Recommendations	Agent(s) responsible for addressing each recommendation	Date Recommendation was addressed or expected to be addressed. (MM/DD/YYYY)	The manner each recommendation was or is expected to be addressed	Status
			Inappropriate use of the recording of meetings feature in Zoom and inadvertent disclosure of recordings may lead to a breach.	1. Develop procedures related to the appropriate steps to take by the host in recording of meetings, appropriate storage of recordings in POGO network drive and deletion of recording when no longer needed.	Privacy Office	December 21, 2020	1. POGO agents follow the POGO Zoom guidance document related to recordings. Privacy policies and information management practices are in place and implemented and shared with POGO staff.	Completed

Name of Data Holding, Technology, Program or Initiative Reviewed	Date PIA completed or expected to be completed (MM/DD/YY)	Agent completing/ensuring the completion of the PIA	Summary of Risk Description	Summary of Recommendations	Agent(s) responsible for addressing each recommendation	Date Recommendation was addressed or expected to be addressed. (MM/DD/YYYY)	The manner each recommendation was or is expected to be addressed	Status
<b>MS O365 Exchange online (email services)</b>	<b>April 2022</b>	Privacy Officer	Email Encryption (“data at rest” not actively in transit) If emails “at rest” are not encrypted, then unauthorized users can access these email.	<ol style="list-style-type: none"> <li>1. Recommend system to automatically encrypt emails.</li> <li>2. Ensure MS data centre is located in Canada.</li> </ol>	System & Network Analyst	06/01/2022	<ol style="list-style-type: none"> <li>1. Encryption is implemented by Microsoft automatically as soon as user mailbox is created.</li> <li>2. Emails “at rest” are encrypted via an encryption technology and are stored in datacenters in Canada.</li> </ol>	Completed
			Email encryption (“in transit”) –If emails in transit are not encrypted – potentially unauthorized person can see content of emails as well as emails can	<ol style="list-style-type: none"> <li>1. Require POGO staff to comply with POGO’s current Email policy prohibiting PHI to be sent via email.</li> <li>2. Utilize encryption email feature available if</li> </ol>	Privacy Officer and System & Network Analyst	06/01/2022	<ol style="list-style-type: none"> <li>1. Reminder provided to POGO Staff to comply with POGO Email policy on April 19, 2022.</li> <li>2. Reminder provided to POGO Staff that Outlook has the ability to encrypt</li> </ol>	Completed

			be forwarded to 3 <sup>rd</sup> party.	necessary for confidential information.			email “on demand” as well as block email forwarding.	
			Viruses, malware and phishing allows unauthorized person to have access to email content or as in case of ransomware access to data located on user computer as well.	1. Recommend implementing Microsoft Defender Services Suite – including antivirus, anti-phishing, and SafeLink protection.	System & Network Analyst	06/01/2022	1. POGO implemented MS Defender protection (antivirus, antimalware, phishing protection), as well as so called “safe links”.	Completed
			Email content can include PHI or sensitive information. While existing POGO policy prohibits emailing PHI data – there is still a risk that users potentially can include PHI details by accident.	1. Recommend additional prevention by implementing the Data Loss Prevention rules.	System & Network Analyst	06/01/2022	1. Data Loss Prevention (DLP) rules are created to prevent the unintentional or accidental sharing of sensitive information over an email.	Completed
			Unauthorized access to	1. Implement multi-factor-	System & Network Analyst	06/01/2022	1. Multi Factor Authentication	Completed

			mailbox in the case of password compromise.	authentication for access to mailbox. 2. Provide training to and support for POGO Staff.			(MFA) has been implemented for all POGO Staff. 2. IT team trained each POGO Staff on multi-factor-authentication during their migration session to O365 email.	
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**Data Holdings/Initiatives (6)**

Name of Data Holding, Technology, Program, or Initiative Reviewed	Date PIA completed or expected to be completed (MM-DD-YYYY)	Agent completing/ ensuring the completion of the PIA	Summary of Risk Description	Summary of Recommendations	Agent(s) responsible for addressing each recommendation	Date Recommendation was addressed or expected to be addressed. (MM-DD-YYYY)	The manner each recommendation was or is expected to be addressed	Status
AfterCare Program Web Application	April 30, 2021	Senior Clinical Program Manager and Privacy Officer	Unauthorized attempts to access the AfterCare Web application via internet.	1. Restrict access to IP address of participating AfterCare centres.	Privacy Officer and Network/Systems Analyst	May 2021	1. This application is not accessible from public internet and only accessible from the hospital computers (AfterCare Clinics) with the hospital's external IP address.	Completed
			Multiple Login attempts: Unauthorized users from an AfterCare centre computer may attempt logon to the AfterCare application.	1. Restrict logon attempts. 2. Log and review blocked attempts. 3. Passwords must follow POGO Password policy.	Privacy Officer and Network/Systems Analyst	May 2021	1. Block logon after 3 failed attempts and record in system logs. 2. Review of blocked attempts alerts by System Administrator and reported as per policy to Supervisor. 3. Login process employs double-	Completed

							authentication and enforces use of strong passwords. Limit on login attempts has been implemented.	
			Authorized user leaves computer unattended while still logged in.	<ol style="list-style-type: none"> <li>1. Instruct users to not leave live session unattended and to log off accordingly.</li> <li>2. Implement automatic log off when system idle for determined time period.</li> </ol>	Privacy Officer Network/Systems Analyst	May 2021	<ol style="list-style-type: none"> <li>1. Instructions provided to authorized users to not leave live sessions unattended.</li> <li>2. POGO system configured to terminate user access to the session when keyboard idle (15 minutes) detected. User must log back into application via double-authentication to resume the session.</li> </ol>	
			Attempts, by unauthorized third parties, to capture and decipher data transmission over the	<ol style="list-style-type: none"> <li>1. Implement encryption security standard as per POGO standards to avoid</li> </ol>	Privacy Officer Network/Systems Analyst	May 2021	<ol style="list-style-type: none"> <li>1. Implemented HTTPS, SSL/TLS encryption security standard. This has been completed. POGO is using TLS</li> </ol>	Completed

			Internet between the local AfterCare centre computer and POGO server during live session.	unauthorized attempts.			version 1.2. The database sits on POGO's server behind the POGO Firewall and the database is encrypted.	
			Database content (including PHI) may be intentionally or inadvertently conveyed via unsecured methods or extracted to unauthorized locations leading to a breach.	1. Require users to adhere to POGO policies and procedures related to confidentiality and security of data.	Senior Clinical Program Manager and Privacy Officer	May 2021	1. Users understand and comply with POGO requirements for confidentiality and security included in the Member User Registration Agreement (Confidentiality agreements) for all users. All users must report breach events to POGO Privacy officers immediately upon identification.	Completed
			Access to patient records between AfterCare clinics.	1. Implement policy and procedures within the application to enable only authorized viewing of	Senior Clinical Program Manager, Privacy Officer and Database Programmer	May 2021	1. The application search mechanism was designed to allow users at a particular centre to access only those patient records	Completed

				patient records from a different AfterCare clinic when patient is shared between AfterCare clinics.			collected/entered at their AfterCare clinic and or shared by AfterCare clinics.	
			Unsuccessful Patient Search due to patient name change.	1. To avoid failed or improper attempts to search patients, Implement process where original name (in POGONIS application) can be viewed only by user to enable update of patient name.	Senior Clinical Program Manager, Privacy Officer and Database Programmer	May 2021	1. The “name at diagnosis” (in POGONIS) is read-only in the AfterCare application. The “current name’ is read/write by the AfterCare clinic. The primary POGO identifier is visible and read-only to the AfterCare centre attended by the patient for AfterCare follow-up.	Completed
			Unsuccessful Patient Search due to multiple entries of same patient name.	1. To avoid viewing a patient record with duplicate name, Implement process where user is able to search using	Senior Clinical Program Manager, Privacy Officer and Database Programmer	May 2021	1. Application allows users to have read-only access to patient identifiers to confirm correct patient to be accessed. The primary POGO	Completed

				other identifiers e.g. date of birth, POGO registration ID, gender, to confirm correct patient accessed.			identifier is visible and read-only to the AfterCare centre attended by the patient for AfterCare follow-up.	
<b>POGO School and Work Transitions Virtual Visits and e-Consent Process</b>	January 2021	The POGO School and Work Transitions Manager and Privacy Officer	New virtual visit processes could lead to privacy breaches.	<ol style="list-style-type: none"> <li>1. Create secure process for eConsent for clients.</li> <li>2. Create guidelines of Virtual Visits for clients and Counsellors; and provide related training for POGO Counsellors.</li> </ol>	The POGO School and Work Transitions Manager and Privacy Officer	March 2021	<ol style="list-style-type: none"> <li>1. eConsent process implemented using REDCap.</li> <li>2. Guidelines developed and shared; training completed; and reference materials in place.</li> </ol>	Completed
<b>POGO Pediatric Oncology System Quality Indicator Initiative</b>	July 13, 2020	Manager Health Analytics and Privacy Officer	Absence of standardized privacy statement may lead to privacy breach.	<ol style="list-style-type: none"> <li>1. Create standardized privacy warning/ statement for the System Quality Indicator Report.</li> <li>2. Create new process to display POGO's Privacy</li> </ol>	Manager Health Analytics and Privacy Officer	July 13, 2020	<ol style="list-style-type: none"> <li>1. Privacy warning statement created by Privacy Officer.</li> <li>2. POGO Health Analytics team members included the automated POGO Privacy statement with requirement to "accept" on all System Quality Indicator Reports.</li> </ol>	Completed

				Disclaimer automatically when report is opened/reopened. Require user to click "I accept" button to unhide other report sections/tabs.				
			Release of small cell data may lead to re-identification of patient.	<ol style="list-style-type: none"> <li>1. Require all reports to be reviewed by the Small Cell Committee and Privacy Officer.</li> <li>2. POGO Privacy Disclaimer will appear on each report page.</li> </ol>	Manager Health Analytics and Privacy Officer	July 13, 2020	<ol style="list-style-type: none"> <li>1. All reports were reviewed by Small Cell Committee where applicable and follow the Small Cell policy and procedures for the release of data.</li> <li>2. POGO Health Analytics team members included the POGO Privacy Disclaimer on all System Quality Indicator Reports.</li> </ol>	Completed
			Unsecure transfer of reports.	<ol style="list-style-type: none"> <li>1. All reports to be delivered using POGO secure FTP and follow the POGO Secure Transfer policy.</li> </ol>	Manager Health Analytics and Privacy Officer	July 13, 2020	<ol style="list-style-type: none"> <li>1. All reports were transferred using POGO Secure FTP and policy and procedures followed.</li> </ol>	Completed

<b>POGO/OH AYA Data Cohort</b>	July 28, 2020	Manager Health Analytics and Privacy Officer	Additional Data elements needed for AYA Data Cohort Initiative.	1. In collaboration with OH, POGO recommended an amendment to the POGO/CCO DSA.	Privacy Officer	October 16, 2020	1. OH-POGO Amended the 2014 signed DSA to include the new data elements required for this initiative.	Completed
<b>First Nations</b>	March 29, 2022	Senior Clinical Lead, Strategic Initiatives, Manager, Education and Outreach and Privacy Officer	Exposure of sensitive patient and family data i.e. email addresses and family name via survey.	1. The data to be stored electronically on a secure servers where the access is limited only for pre-authorized people. Policies and Procedures (P/P) are in place to secure and protect the data by where the data is created and, by whom, when and where it is stored. P/P are in place to govern the transferring of record level data.	Manager, Education and Outreach and Privacy Officer	March 29, 2022	1. The data was stored electronically on secure servers where the access is limited only for pre-authorized people. Policies and Procedures (P/P) were followed to secure and protect the data by where the data was created and, by whom, when and where it was stored. P/P are in place to govern the transferring of record level data.	Completed
			Breach detection –	1. Educate and train POGO staff	Privacy Officer and IT Team	March 29, 2022	1. Education and training of POGO staff on Wufoo	Completed

			Wufoo survey intentionally or inadvertently accessed by internal or external agents.	on Wufoo application.			application was completed by IT team.	
			Data/File Transfers between creative team and POGO.	<ol style="list-style-type: none"> <li>1. All de-identified, aggregate data is transferred electronically via encrypted secure FTP servers where the access is limited only for pre-authorized agents. Policies and Procedures are in place to secure and protect the data being transferred, by whom, when and where it is stored in the POGO network.</li> <li>2. When the data transfer is done via POGO's own secure FTP</li> </ol>	Manager, Education and Outreach and Privacy Officer	March 29, 2022	<ol style="list-style-type: none"> <li>1. All de-identified, aggregate data was transferred electronically via encrypted secure FTP servers and the recipient was in contact until the transfer was complete and the files were deleted from POGO's secure FTP server immediately after the transfer.</li> <li>2. All interview records will be destroyed as per POGO <i>Policy #9.2.6</i> at the end of the project.</li> </ol>	Completed

				<p>server; the recipient should remain in contact until the transfer is complete and the files are deleted from POGO's secure FTP server immediately after the transfer.</p> <p>3. All interview records will be destroyed as per POGO <i>Policy #9.2.6</i> at the end of the project.</p>				
<b>Interlink Program Evaluation</b>	March 12, 2022	Director Strategic Projects, POGO Provincial Clinical Lead, Pediatric Oncology Nursing and Privacy Officer	Exposure of sensitive patient and family data i.e. email addresses and family name via survey.	<p>1. The data to be stored electronically on a secure servers where the access is limited only for pre-authorized people. Policies and Procedures (P/P) are in place to secure and protect the data by where</p>	Director Strategic Projects, POGO Provincial Clinical Lead, Pediatric Oncology Nursing and Privacy Officer	April 14, 2022	<p>1. The data was stored electronically on secure servers where the access is limited only for pre-authorized people. Policies and Procedures (P/P) were followed to secure and protect the data by where the data was created</p>	Completed

				the data is created and, by whom, when and where it is stored. P/P are in place to govern the transferring of record level data.			and, by whom, when and where it was stored. P/P are in place to govern the transferring of record level data.	
			Data extraction from POGONIS, creation of record level files & lists provided to POGO Health Analytics Staff.	1. The data is stored electronically on a secure servers where the access is limited only for pre-authorized people. Policies and Procedures (P/P) are in place to secure and protect the data by where the data is created and, by whom, when and where it is stored. P/P are in place to govern the transferring of record level data.	Director Strategic Projects, POGO Provincial Clinical Lead, Pediatric Oncology Nursing and Privacy Officer	April 14, 2022	1. The data was stored electronically on a secure servers where the access is limited only for pre-authorized people. Policies and Procedures (P/P) were followed to secure and protect the data by where the data was created and, by whom, when and where it was stored. P/P are in place to govern the transferring of record level data.	Completed

			Health Analytics Staff provides record-level data to Senior Project Team.	1. POGO Health Analytics Staff discloses aggregate data to the POGO Senior Project team which includes Cathexis consultants as per the policies and procedures and as approved in the Project documentation.	Health Analytics team and Privacy Officer	April 14, 2022	1. POGO Health Analytics Staff disclosed aggregate data to the POGO Senior Project team.	Completed
			Breach detection – REDCap survey intentionally or inadvertently accessed.	1. Webserver and database are behind a POGO firewall. 2. The webserver is set up with an SSL certificate to maintain secure communications with end-users. 3. Network/System Analyst to perform backups of all servers daily.	Privacy Officer and IT Team	April 14, 2022	1. Education and training of POGO staff on Wufoo application was completed by IT team.	Completed
			Data/File Transfers between	1. All de-identified, aggregate data is transferred electronically	Manager, Education and Outreach and Privacy Officer	April 14, 2022	1. All de-identified, aggregate data was transferred electronically via	Completed

			Cathexis and POGO.	via encrypted secure FTP servers where the access is limited only for pre-authorized agents. Policies and Procedures are in place to secure and protect the data being transferred, by whom, when and where it is stored in the POGO network. When the data transfer is done via POGO's own secure FTP server; the recipient should remain in contact until the transfer is complete and the files are deleted from POGO's secure FTP server immediately after the transfer.			encrypted secure FTP servers and the recipient was in contact until the transfer was complete and the files were deleted from POGO's secure FTP server immediately after the transfer. 2. All interview records will be destroyed as per POGO <i>Policy #9.2.6</i> at the end of the project.	
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				2. All interview records will be destroyed as per POGO <i>Policy #9.2.6</i> at the end of the project.				
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**Research Projects (3)**

Name of Data Holding, Technology, Program, or Initiative Reviewed	Date PIA completed or expected to be completed (MM-DD-YYY)	Agent completing/ ensuring the completion of the PIA	Summary of Risk Description	Summary of Recommendations	Agent(s) responsible for addressing each recommendation	Date Recommendation was addressed or expected to be addressed. (YYYY-MM-DD)	The manner each recommendation was or is expected to be addressed	Status
<b>Project # 194: BENCHISTA Project</b>	Dec 9, 2021	Principal Investigator	N/A	No further recommendation made by Privacy Officer	N/A	N/A	N/A	Completed
<b>Project #195: Determining the Impact of Pediatric Heart Failure in the Current Era The SickKids Experience</b>	June 26, 2022	Principal Investigators	N/A	No further recommendation made by Privacy Officer	N/A	N/A	N/A	Completed
<b>Project #196: A retrospective study of pediatric patients treated with proton radiation therapy in Canada</b>	March, 25, 2022	Principal Investigators	N/A	No further recommendation made by Privacy Officer	N/A	N/A	N/A	Completed

**Section D – Privacy Impact Assessment Log**

**Data Holdings/Initiatives (6)**

Name of Data Holding, Technology, Program, or Initiative Reviewed	Date PIA completed or expected to be completed (MM-DD-YYY)	Agent completing/ensuring the completion of the PIA	Summary of Risk Description	Summary of Recommendations	Agent(s) responsible for addressing each recommendation	Date Recommendation was addressed or expected to be addressed. (YYYY-MM-DD)	The manner each recommendation was or is expected to be addressed	Status
<b>AfterCare Database</b>	July 1, 2022	Senior Clinical Program Manager and Privacy Officer	N/A	Update the PIA in accordance to new POGO template PIA for data holdings to include: <ul style="list-style-type: none"> <li>• Overview of data holding</li> <li>• Purpose and scope of PIA</li> <li>• Updated data flow diagrams</li> <li>• Transaction analysis for each collection, use and disclosure</li> <li>• Legislative analysis</li> <li>• Privacy assessment based on the 10 principles in the POGO Privacy and Data Security Code</li> <li>• Threat and Risk Assessment</li> </ul>	Senior Clinical Program Manager and Privacy Officer and Data/IT Staff	July 7, 2022	Program Manager together with Privacy Officer and Data/IT team completed the transfer of information into the new PIA template.	Completed

				<ul style="list-style-type: none"> <li>• Risk Acknowledgement</li> </ul>				
<b>Satellite Database</b>	June 30, 2022	Senior Clinical Program Manager and Privacy Officer	N/A	<p>Update the PIA in accordance to new POGO template PIA for data holdings to include:</p> <ul style="list-style-type: none"> <li>• Overview of data holding</li> <li>• Purpose and scope of PIA</li> <li>• Updated data flow diagrams</li> <li>• Transaction analysis for each collection, use and disclosure</li> <li>• Legislative analysis</li> <li>• Privacy assessment based on the 10 principles in the POGO Privacy and Data Security Code</li> <li>• Threat and Risk Assessment</li> <li>• Risk Acknowledgement</li> </ul>	Senior Clinical Program Manager and Privacy Officer and Data/IT Staff	July 4, 2022	Program Manager together with Privacy Officer and Data/IT team completed the transfer of information into the new PIA template.	Completed
<b>Financial Assistance Program</b>	June 25, 2022	Manager Financial Assistance	N/A	Update the PIA in accordance to new POGO template PIA	Manager Financial Assistance Program and	July 18, 2022	Program Manager together with Privacy Officer and Data/IT team completed the	Completed

		Program and Privacy Officer		<p>for data holdings to include:</p> <ul style="list-style-type: none"> <li>• Overview of data holding</li> <li>• Purpose and scope of PIA</li> <li>• Updated data flow diagrams</li> <li>• Transaction analysis for each collection, use and disclosure</li> <li>• Legislative analysis</li> <li>• Privacy assessment based on the 10 principles in the POGO Privacy and Data Security Code</li> <li>• Threat and Risk Assessment</li> <li>• Risk Acknowledgement</li> </ul>	Privacy Officer and Data/IT Staff		transfer of information into the new PIA template.	
<b>POGO Interlink Nursing Program Database</b>	January 14, 2022	POGO Provincial Clinical Lead, Pediatric Oncology Nursing and Privacy Officer	N/A	<p>Update the PIA in accordance to new POGO template PIA for data holdings to include:</p> <ul style="list-style-type: none"> <li>• Overview of data holding</li> <li>• Purpose and scope of PIA</li> </ul>	POGO Provincial Clinical Lead, Pediatric Oncology Nursing and Privacy Officer and Data/IT Staff	June 6, 2022	Program Manager together with Privacy Officer and Data/IT team completed the transfer of information into the new PIA template.	Completed

				<ul style="list-style-type: none"> <li>• Updated data flow diagrams</li> <li>• Transaction analysis for each collection, use and disclosure</li> <li>• Legislative analysis</li> <li>• Privacy assessment based on the 10 principles in the POGO Privacy and Data Security Code</li> <li>• Threat and Risk Assessment</li> <li>• Risk Acknowledgement</li> </ul>				
<b>POGONIS</b>	June 2022	Senior Database Administrator, Database Administrator & Programmer and Privacy Officer	N/A	<p>Update the PIA in accordance to new POGO template PIA for data holdings to include:</p> <ul style="list-style-type: none"> <li>• Overview of data holding</li> <li>• Purpose and scope of PIA</li> <li>• Updated data flow diagrams</li> <li>• Transaction analysis for each collection, use and disclosure</li> </ul>	Senior Database Administrator, Database Administrator & Programmer and Privacy Officer	July 6, 2022	Program Manager together with Privacy Officer and Data/IT team completed the new PIA template.	Completed

				<ul style="list-style-type: none"> <li>• Legislative analysis</li> <li>• Privacy assessment based on the 10 principles in the POGO Privacy and Data Security Code</li> <li>• Threat and Risk Assessment</li> <li>• Risk Acknowledgement</li> </ul>				
<b>The POGO School and Work Transitions Program</b>	March 2022	Program Manager and Privacy Officer	N/A	<p>Update the PIA in accordance to new POGO template PIA for data holdings to include:</p> <ul style="list-style-type: none"> <li>• Overview of data holding</li> <li>• Purpose and scope of PIA</li> <li>• Updated data flow diagrams</li> <li>• Transaction analysis for each collection, use and disclosure</li> <li>• Legislative analysis</li> <li>• Privacy assessment based on the 10 principles in the</li> </ul>	Program Manager and Privacy Officer and Data/IT Staff	July 14, 2022	Program Manager together with Privacy Officer and Data/IT team completed the new PIA template.	Completed

				<p>POGO Privacy and Data Security Code</p> <ul style="list-style-type: none"><li>• Threat and Risk Assessment</li><li>• Risk Acknowledgement</li></ul>				
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## **Section E –Privacy Audit Program Log**

**POGO Program Area Privacy Compliance Reviews**

<b>Programs</b>	<b>Description of Audit</b>	<b>Review Date</b>	<b>Recommendation</b>	<b>Date Addressed or Proposed</b>	<b>Manner Each Recommendation Addressed or Proposed Manner</b>
<b>POGO Physical Security Audits</b>	Audit of agents granted approval to access and use personal health information (program managers confirm that all active agents continue to require the level of access provided and that terminated agents are terminated accordingly)	1-Apr-20	1. No instances of non-compliance found.	30-Apr-2	No action required.
		1-Apr-21	1. No instances of non-compliance found.	3-Apr-21	No action required
		1-Apr-22	1. No instances of non-compliance found.	29-Apr-22	No action required.
<b>POGO Physical Security Audits</b>	Audits of agents with access to the premise (Privacy Office conducts audit of the key and card access and confirm level of access assigned to all agents with access to the premise)	1-Sept-20	1. No instances of non-compliance.	30-Sept-20	No action required.
		1-Sept-21	1. No instances of non-compliance.	30-Sept-21	No action required.
		1-Apr-22	1. No instances of non-compliance.	15-Apr-22	No action required
<b>Education</b>	Review of Event services vendor procurement	21-Jan-20	1. Select a Canadian based vendor to ensure data are stored in Canada.	21-Jan-20	1. Vendor selected was based in Canada.
<b>POGO</b>	Implementation of a Software Application Request Process	3-Mar-20	1. Create an operational procedure to ensure analysis of privacy/security issues related to new Software Application requests from POGO Internal Agents and PIA where required.	3-Mar-20	1. New operational procedure implemented.
<b>Privacy</b>	POGO Staff Key and Security Pass Audit	21-Feb-20	1. Create a new logging process to streamline tracking.	21-Feb-20	1. Created a new log and updated it with all POGO staff keys and badges accordingly.

Programs	Description of Audit	Review Date	Recommendation	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
<b>The School and Work Transitions Program</b>	Information transfer processes review	29-Apr-20	<ol style="list-style-type: none"> <li>Given remote work environment due to the pandemic, create individual FTP sites for the School and Work Transitions Program Counsellors.</li> <li>Train them on web link FTP to transfer PHI to school and other external organizations.</li> <li>Review and Update Secure Transfer Policy.</li> </ol>	20-May-20	<ol style="list-style-type: none"> <li>System &amp; Network Analyst created FTP accounts for the Transitions to School and Work Program Counsellors.</li> <li>Trained POGO Counsellors on web link FTP to transfer PHI to school and other external organizations.</li> <li>Secure Transfer reviewed and updated to include the School and Work Transitions Program Counsellors to the list of agents who use the FTP process.</li> </ol>
<b>POGO</b>	Review FTP processes	20-May-20	<ol style="list-style-type: none"> <li>Add Privacy Notice to Gateway for FTP usage.</li> </ol>	20-May-20	<ol style="list-style-type: none"> <li>Below <i>Confidentiality and Privacy Notice</i> added to FTP server:             Privacy is your responsibility:            Only access the POGO FTP Server and files you are authorized to access!             You are reminded that your access to the POGO FTP server is audited. The audit trail is available to the Privacy office. POGO's Privacy Breach Policy contains consequences for breaching patient privacy or confidentiality.</li> </ol>
<b>Privacy</b>	Data holding Gateway process review	20-May-20	<ol style="list-style-type: none"> <li>Add Privacy Notice to all Gateway servers for all PHI data holdings.</li> </ol>		<ol style="list-style-type: none"> <li>Below <i>Confidentiality and Privacy Notice</i> added to all data holdings gateway server screens:             Privacy is your responsibility:            Only access the POGO FTP Server and files you are authorized to access!             You are reminded that your access to the POGO FTP server is audited. The audit trail is available to the Privacy office.</li> </ol>

Programs	Description of Audit	Review Date	Recommendation	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
					POGO's Privacy Breach Policy contains consequences for breaching patient privacy or confidentiality.
<b>Interlink</b>	Information transfer processes	7-Jan-20	<ol style="list-style-type: none"> <li>Given remote work environment due to the pandemic, create individual FTP sites for Interlink Nurses to send PHI to schools.</li> <li>Train Interlink nurses on web link FTP to transfer PHI to school and other external organizations.</li> <li>Review and Update Secure Transfer Policy.</li> </ol>	7-Jan-20	<ol style="list-style-type: none"> <li>System &amp; Network Analyst created FTP accounts for Interlink Nurses.</li> <li>Trained Interlink Nurses on web link FTP to transfer PHI to school and other external organizations.</li> <li>Secure Transfer reviewed and updated to include Interlink Nurses to the list of agents who use the FTP process.</li> </ol>
<b>Privacy</b>	Privacy Impact Assessments Template Review	2020	<ol style="list-style-type: none"> <li>To address the IPC Recommendation # 3 audit review (2017 – 2020), Privacy team researched PIA templates used by other Prescribed Entities to ensure POGO complies with IPC recommendation to make PIA template more robust and comprehensive.</li> </ol>	2020	<ol style="list-style-type: none"> <li>Developed and implemented new PIA template and updated PIAs for each POGO PHI Data Holding. See <a href="#">Section C</a> for details.</li> </ol>
<b>Financial Assistance Program</b>	Address Financial Assistance Program short-form name change	2020	<ol style="list-style-type: none"> <li>Update all documentation to current program name/short-form: FA Program or Financial Assistance Program.</li> </ol>	2020	<ol style="list-style-type: none"> <li>All documentation has now been updated.</li> </ol>
<b>Privacy</b>	Review process to contact POGO Privacy Program	2020	<ol style="list-style-type: none"> <li>Create a new Privacy Program email so all Privacy team members receive incoming privacy related emails</li> </ol>	2020	<ol style="list-style-type: none"> <li>Generic Privacy email has been created for POGO Privacy Office. All documentation and web site references updated.</li> </ol>
<b>AfterCare Application</b>	Review need for privacy disclaimer for AfterCare application.	May 2021	<ol style="list-style-type: none"> <li>In reference to Decision 144 (IPC), Privacy Officer recommended Privacy Disclaimer to be applied to new AfterCare application login page.</li> </ol>	May 2021	<ol style="list-style-type: none"> <li>Systems Network Analyst added Privacy disclaimer to new AfterCare web application login page.</li> </ol>
<b>The POGO School and Work Transitions Program</b>	Review the POGO School and Transitions Program Consent forms	2021	<ol style="list-style-type: none"> <li>Create improved, secure process for clients to submit consent forms to replace scanning.</li> </ol>	2021	<ol style="list-style-type: none"> <li>New consent form process implemented. Privacy and security PIA completed.</li> <li>Training and documentation guidelines completed.</li> </ol>

Programs	Description of Audit	Review Date	Recommendation	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
			2. Train and prepare guidance documentation.		
<b>The POGO School and Work Transitions Program Virtual Visits Guidelines</b>	Review the POGO School and Transitions Program processes for virtual service	2021	1. Create guidelines for clients and counsellors based on IPC documentation related to Virtual Health Visits.	June 2021	1. Guidelines for privacy and safety measures on how to keep clients safe when on a virtual visit created and implemented.
<b>Privacy</b>	POGO Privacy Website and Whiteboard Communications	2021	1. Privacy to review website to ensure privacy and security documents up to date. 2. Communicate any updates to POGO Staff via whiteboard communication.	April 2021	1. Privacy reviewed website and confirmed all documents were up to date and in accordance with IPC Manual requirements. 2. Staff Whiteboard update given on Privacy page.
<b>Privacy</b>	Review Internal agents definition	2021	1. Based on POGO staff inquiry, Privacy to review the definition of Internal Agent definition as it applies to POGO internal volunteers. 2. Update all documentation and communicate change with POGO Staff.	2021	1. Privacy Officer updated the definition of Internal Agents to include “employees, students, and volunteers <b><i>who are provided with a POGO network account</i></b> and engaged in work for, or on behalf of POGO”. 2. All Privacy applicable documents updated and change communicated with POGO Staff.
<b>Interlink</b>	Review need for Privacy disclaimer for Email Communications with Schools	2021	1. To heighten the awareness of maintaining the privacy and confidentiality of personal health information shared by Interlink Nurses with individuals in a child’s school team, Privacy recommended the addition of a disclaimer for Interlink Nurses to include in school staff email communication.	2021	1. The following disclaimer was included in all email communications from the Interlink Nurses to school staff: "As school staff you may be provided with a student's personal health information as it relates to supporting that student in the school. Health information is confidential and should not be shared in any context without a family's consent. <b>Please refer to school board specific policies on professional conduct and the protection of privacy and confidentiality.</b> "
<b>AfterCare</b>	Audit AfterCare laptops	October 2021	1. Given the new AfterCare web application, Privacy Officer recommended that all laptops	October 2021	1. Privacy consulted with the AfterCare Program Manager who confirmed only one centre utilized a POGO laptop for data collection for AfterCare. Privacy

Programs	Description of Audit	Review Date	Recommendation	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
			<p>provided to POGO AfterCare programs were reviewed and data destroyed by local IT.</p> <p>2. Programs to complete a certificate of destruction and provide to POGO.</p>		<p>Officer corresponded with centre's Data Manager to ensure laptop reviewed and data destroyed according to POGO guidelines.</p> <p>2. A Certificate of Destruction was received by POGO.</p>
<b>POGONIS</b>	PIA	June 2022	Review and update PIA to new POGO Template with Program team members.	July 2022	see <a href="#">Section D</a>
<b>Satellite</b>	PIA	June 2022	Review and update PIA to new POGO Template with Program team members.	July 2022	see <a href="#">Section D</a>
<b>AfterCare</b>	PIA	July 2022	Review and update PIA to new POGO Template with Program team members.	July 2022	see <a href="#">Section D</a>
<b>Interlink Nurses</b>	PIA	January 2022	Review and update PIA to new POGO Template with Program team members.	June 2022	see <a href="#">Section D</a>
<b>The POGO School and Work Transitions</b>	PIA	March 2022	Review and update PIA to new POGO Template with Program team members.	July 2022	see <a href="#">Section D</a>
<b>Financial Assistance Program</b>	PIA	April 2022	Review and update PIA to new POGO Template with Program team members.	July 2022	see <a href="#">Section D</a>
<b>Interlink</b>	PIA for Evaluation Project	March 2022	Review and update PIA to new POGO Template with Program team members.	March 2022	see <a href="#">Section D</a>
<b>The POGO School and Work Transitions</b>	PIA for Evaluation Project	April 2022	Review and update PIA to new POGO Template with Program team members.	April 2022	see <a href="#">Section D</a>

**External Privacy Compliance Review:**

Programs	Description of Audit	Review Date	Recommendation	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
Research	Privacy Audit of Project #105: <i>Socioeconomic Status and Survival Among Pediatric Oncology Patients in Ontario</i> compliance with project specific PIA	January 10, 2022	1. Requested a Certificate of Data Destruction if applicable.	January 10, 2022	1. Date of data destruction reviewed and Certificate of Destruction received and logged.
Research	Privacy Audit of Project #91: <i>Second Malignant Neoplasms after non-CNS Embryonal Tumors</i> compliance with project specific PIA	January 10, 2022	1. Requested a Certificate of Data Destruction if applicable.	January 10, 2022	1. Date of data destruction reviewed. Publication in October 2017 with a retention period of 5 years after the publication to respond to any queries. POGO data will be kept until the October 2022 (in keeping with retention practice of 5-year post-publication). Data will be destroyed in October 2022. POGO Privacy to follow up with PI. Reminder placed in Calendar for follow up. We will destroy the data then.
Research	Privacy Audit of Project #71: <i>Patterns and Predictors of Health Care Utilization by Adult Survivors of Childhood Cancer: A POGO and ICES Population Database Linkage Study</i>	January 10, 2022	1. Requested a Certificate of Data Destruction if applicable.	January 11, 2022	1. Date of data destruction reviewed. Co-PI confirmed data remains at ICES in their secure operating system and PI only has aggregate output tables generated. No individual record level data available to PIs.
Research	Privacy Audit of Project #82: <i>Long-Term Survival of Pediatric Patients Undergoing Hematopoietic Cell Transplantation in Ontario</i> compliance with project specific PIA	January 10, 2022	1. Requested a Certificate of Data Destruction if applicable.	January 18, 2022	1. Date of data destruction reviewed and Certificate of Destruction received and logged.
Research	Privacy Audit of Project #92:	January 10,	1. Requested a Certificate of Data	July 25, 2022	1. Principal Investigator confirmed in July 2022 all

	<i>Improving Transition to Follow-Up Care in Childhood Cancer Survivors: Development of a Questionnaire to Measure Transition Readiness</i> compliance with project specific PIA	2022	Destruction if applicable.		questionnaires and study data destroyed using hospital confidential recycling bins. Certificate of Destruction completed and logged.
<b>Research</b>	Privacy Audit of Project #119: <i>Malignancy Among Aboriginal Children in Ontario</i> compliance with project specific PIA	January 10, 2022	1. Requested a Certificate of Data Destruction if applicable.	January 12, 2022	1. Principal Investigator confirmed only aggregate output data stored for retention for publication. PHI datasets are stored at POGO in a secure server. Data folders destroyed by Privacy Officer and Certificate of Destruction completed and logged.
<b>Research</b>	Privacy Audit of Project #121: <i>Malignancy Risk in Childhood Recipients of Solid Organ Transplants</i> compliance with project specific PIA	January 10, 2022	1. Requested a Certificate of Data Destruction if applicable.	January 10, 2022	1. Date of data destruction reviewed. Co-PI confirmed data remains at ICES in their secure operating system and PI only has aggregate output tables generated. No individual record level data available to PIs.

**Section F – Privacy Audit Log**

**OTHER PRIVACY AUDIT REVIEWS:  
INTERNAL PRIVACY POLICIES AND PROCEDURE REVIEW**

See [Section A](#) and [Section I](#) for details.

**TOPIC AREA**

Programs	Description of Audit	Review Date	Recommendation	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
Privacy	Review Email notification for external emails being received at POGO	21-Jan-10	<ol style="list-style-type: none"> <li>1. Privacy recommended notification alert be created for all External Emails appearing in POGO Staff Outlook Inbox.</li> <li>2. Communicate update to POGO Staff.</li> </ol>	21-Jan-20	<ol style="list-style-type: none"> <li>1. System &amp; Network Analyst implemented an External Email Notification in POGO Exchange Server. Notification are displayed for all Staff external email.</li> <li>2. New feature communicated to Staff.</li> </ol>
Privacy	Review Ontario Public Service Data Integration Data Standards	January 2021	<ol style="list-style-type: none"> <li>1. As recommended in IPC Podcast, Privacy Office reviewed the Ontario Public Service Data Integration Data Standards website.</li> <li>2. Implement any recommended updates to POGO data standards.</li> </ol>	January 2021	<ol style="list-style-type: none"> <li>1. Upon review, Privacy Office confirmed POGO policies and procedures complied with the data standards. Feedback provided to POGO CEO accordingly.</li> <li>2. No updates required.</li> </ol>
Privacy	Review Access Privacy by Osler Service	July 2021	<ol style="list-style-type: none"> <li>1. Privacy Officer requested subscription to Osler Access Privacy Portal.</li> </ol>	July 2021	<ol style="list-style-type: none"> <li>1. Once subscription confirmed, Privacy Officer and/or Associate Privacy Officer attended monthly Privacy webinars.</li> </ol>
Privacy	Review PHI Data Holding Data Flow Diagrams	June 2021	<ol style="list-style-type: none"> <li>1. Privacy Officer recommended the review and update of all PHI Data Holding Data Flow Diagrams by Data/IT team.</li> <li>2. Updates to be included in updated PIAs.</li> </ol>	July 2022	<ol style="list-style-type: none"> <li>1. Data/IT team, Program Managers, CEO and Privacy reviewed and updated all Data Flow Diagrams for PHI Data Holdings.</li> <li>2. Updates were included in the new PHI Data Holding Program PIAs.</li> </ol>
Privacy	Review POGO's new Contact Management System (NXT)	June 2021	<ol style="list-style-type: none"> <li>1. Privacy Office to review of NXT database from Privacy perspective.</li> <li>2. Recommended a Privacy warning to appear in the database if feasible: "Although access to NXT is restricted to authorized POGO staff, add</li> </ol>	December 2021	<ol style="list-style-type: none"> <li>1. Privacy reviewed the NXT database.</li> <li>2. Privacy warning included in the NXT database.</li> <li>3. POGO Staff notified of this new Privacy warning.</li> </ol>

			<p>requirement in policy that “viewing information that does not pertain to your role is not allowed. This is called unauthorized viewing and considered a privacy breach. You are only able to view, use, collect, and disclose information (personal information, confidential information or personal health information) only within your role and access level. Contact the POGO Privacy Officer for more information.</p> <p>3. Notify POGO Staff of Privacy waring.</p>		
<b>Privacy</b>	Review Diversity in Privacy Practices	November 2021	<ol style="list-style-type: none"> <li>1. Privacy Office reviewed International Association of Privacy Professionals (IAPP) Diversity in Privacy Section.</li> <li>2. Provide information to the POGO Human Resources Senior Manager as reference.</li> </ol>	December 2021	<ol style="list-style-type: none"> <li>1. IAPP website link provided to the Human Resources Senior Manager with a goal to review as part of POGO’s commitment to Diversity, Equity and Inclusion activities.</li> </ol>
<b>Privacy</b>	Review Privacy Considerations for POGO’s COVID 19 Staff Attestation form	September 2021	<ol style="list-style-type: none"> <li>1. Privacy Office reviewed POGO’s COVID 19 Attestation form required to be completed by POGO Staff and provided feedback to the Return to Office Committee.</li> <li>2. Return to Office Committee Chair to notify POGO Staff of any updates to the form based on Privacy review.</li> </ol>	September 2021	<ol style="list-style-type: none"> <li>1. Privacy Office met with Return to Office Committee in September 2021. Provided feedback on the proper access and storage of staff completed COVID 19 Attestation forms.</li> <li>2. Staff notified of changes in return to office procedure and the COVID 19 Attestation form by the POGO’s Chair of the Return to Office Committee in September 2021.</li> </ol>

2022

Programs	Name of Program/Project	Review Date	Recommendation	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
Privacy	Review Confidentiality Agreement Processes and Forms	May 2022	1. Created a chart of agreements to be used for each type of Agent to serve as a reference for the POGO team.	September 2022	1. Reference document to be completed and shared with POGO team once completed.
Privacy	Small cell procedures	June 2022	1. Privacy Officer and Senior Analyst, Health Analyst reviewed Small Cell Policy, Small Cell Procedures document and guidance documents. 2. Drafted policy updates and procedure updates according to the review 3. Communicated policy update to POGO Staff. 4. Provide drafted procedure update to the Small Cell Committee.	June 2022  July 2022  September 2022	1. Privacy Officer requested further review of the <i>Small Cell</i> policy by legal consultant in June 2022. 2. Guidelines from the IPC and Stats Canada guidance documents on the release of small cell data were included in draft revised <i>Small Cell Procedures</i> document. 3. Update to Small Cell Policy communicated to staff on July 26, 2022. 4. Drafted procedure to be finalized and approved by September 2022.
Privacy	De-identification and Re-identification	June 2022	1. Privacy Officer and Senior Analyst, Health Analyst reviewed De-identifying and Aggregate Personal Health Policy and guidance documents from IPC (“Real or fake? The buzz about synthetic data” and “Ripe for public debate: Legal and ethical issues around de-identified data”). 2. Drafted policy and procedure updates according to the review. 3. Drafted a new <i>Re-identification Risk Assessment</i> policy. 4. Communicated updates to POGO Staff.	June 2022  July 2022	1. Privacy Officer requested further review of the <i>De-Identified and Aggregate Personal Health Information</i> policy by legal consultant in June 2022. 2. Updated the <i>De-Identified and Aggregate Personal Health Information</i> policy 3. Finalized the new policy <i>Re-identification Risk Assessment</i> following legal counsel review. 4. Communicated the updated and new policy with POGO staff on July 26, 2022.
Privacy	COVID 19 Information and Resources	January 2022	1. Privacy Office reviewed IPC COVID-19 information and Resources document and shared with POGO’s Chair of the Return to Office committee.	January 2022	1. Shared with POGO’s Chair of the Return to Office Committee to incorporate guidance in the Return to Office in January 2022.

**Section G – Privacy Breach Log**

Date Notification Received	Extent of Breach	Internal or External	Nature & Extent of PHI	Date Senior Mgmt. Notified	Description of Containment Measures and Recommendations	Date(s) Containment Implemented	Date(s) HICs/Other Orgs Notified	Date Investigation Commenced & Completed	Date(s) Recommendation Addressed	Manner Recommendation(s) Addressed or Proposed Manner
21-Jan-20	On January 21, 2020 1 email sent from POGONIS Data Manager to POGO Database Administrator with attached file that contained patient's Health Card Number and Date of Birth.	Internal	Patient's Health Card Number and Date of Birth	21-Jan-20	<ol style="list-style-type: none"> <li>All copies of emails and attachments to be double deleted from sender and recipient immediately.</li> <li>Remind individual involved of policy and procedure.</li> </ol>	21-Jan-20	N/A	21-Jan-20	21-Jan-20	<ol style="list-style-type: none"> <li>All agents permanently deleted all copies of email and attachments.</li> <li>Reminder given to POGONIS Data Manager to use encrypted mode of transfer to POGO via a secure server.</li> </ol>
12-June-20	On June 12, 2020, 1 email containing Case Key Numbers and no other PHI was sent by POGO to 1 recipient at Ontario Health.	External	Patient Case Key Numbers for 30 cases. A Case Key Number is an anonymized unique identifier used by Ontario Cancer Registry.	12-June-20	<ol style="list-style-type: none"> <li>All copies of emails to be double deleted from sender and recipient immediately.</li> <li>Procedures documentation to be updated to clarify Case Key Number as PHI.</li> <li>Training to be</li> </ol>	12-Jun-20	12-Jun-20	12-Jun-20	12-Jun-20	<ol style="list-style-type: none"> <li>All agents and all recipients at Ontario Health permanently deleted all copies of email.</li> <li>Updated procedures document to clarify Case</li> </ol>

Date Notification Received	Extent of Breach	Internal or External	Nature & Extent of PHI	Date Senior Mgmt. Notified	Description of Containment Measures and Recommendations	Date(s) Containment Implemented	Date(s) HICs/Other Orgs Notified	Date Investigation Commenced & Completed	Date(s) Recommendation Addressed	Manner Recommendation(s) Addressed or Proposed Manner
					provided to POGO Data/IT and Health Analytics team members.					Key Number as PHI identifier. 3. Training provided to the Data and Health Analytics team members.
20-April-21	Oncologist at partner hospital forwarded a file containing PHI to two internal POGO agents.	Internal	Patient Name and Hospital Chart Number	20-April-21	<ol style="list-style-type: none"> <li>All copies of emails and attachments to be double deleted from sender and recipient.</li> <li>Remind individual involved of correct procedures.</li> </ol>	20-April-22	20-April-21	20-April-21	20-April-21	<ol style="list-style-type: none"> <li>All agents permanently deleted all copies of email and attachments.</li> <li>Reminder to Oncologist to send all confidential PHI files via POGO secure FTP server.</li> </ol>
5-May-21	Policy Breach: Zoom meeting recordings saved to staff personal	Internal	No PHI (Personal and Confidential Information Only).	5-May-21	<ol style="list-style-type: none"> <li>Secure transfer via FTP of the recording to the appropriate POGO staff</li> </ol>	5-May-21	5-May-21	5-May-21	5-May-21	<ol style="list-style-type: none"> <li>Guidance document has been sent to staff re: recordings</li> </ol>

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Date Notification Received	Extent of Breach	Internal or External	Nature & Extent of PHI	Date Senior Mgmt. Notified	Description of Containment Measures and Recommendations	Date(s) Containment Implemented	Date(s) HICs/Other Orgs Notified	Date Investigation Commenced & Completed	Date(s) Recommendation Addressed	Manner Recommendation(s) Addressed or Proposed Manner
	computer instead of POGO server.				network drive. 2. Staff to confirm no PHI recorded. 3. Delete recording from staff personal computer and from Trash can. 4. Obtain confirmation whether personal device backs up to any cloud or anywhere else.					using Zoom and sent to staff as refresher and reminder communication. 2. Staff will not record all other interviews from their POGO Remote Desktop and save recording to the POGO server. 3. Staff confirmed that they recorded Zoom call on personal device. Staff confirms there was no discussion of

Date Notification Received	Extent of Breach	Internal or External	Nature & Extent of PHI	Date Senior Mgmt. Notified	Description of Containment Measures and Recommendations	Date(s) Containment Implemented	Date(s) HICs/Other Orgs Notified	Date Investigation Commenced & Completed	Date(s) Recommendation Addressed	Manner Recommendation(s) Addressed or Proposed Manner
										<p>PHI or data. Recording has been securely transfers to the uploading of FTP and recording has been since deleted from personal device and trash box.</p> <p>4. Staff also confirmed personal device does not back up to any cloud or anywhere else.</p>

**Section H –Part 2 – Security Indicators: Record of Reviews and Updates to General Privacy Policies & Procedures**

Policy Number	Policy Name	Policy Section	Date Reviewed Month/Year	Date Amended or Newly Developed Month/Year	Description of Amendment to Policy and Procedure	Date and Nature of Communication of Policy and Procedure to Agents	Whether Communication materials available to the public or other stakeholders were amended & brief description of the amendments
9.2.1	Information Security Policy	Part 2 – Security Indicators	November 2019	November 2019	Added abbreviation in policy introduction and compliance and breach notification clause as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definitions section; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.2	Ongoing Review of Security Policies Procedures and Practices	Part 2 – Security Indicators	November 2019	November 2019	Added compliance and breach notification clause as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	

			June 2022	June 2022	Added definitions section; added reference to Policy 4.1 <i>POGO Privacy and Security Audit Program Purpose of Reviews</i> ; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.3	Security Standards and Procedures	Part 2 – Security Indicators	June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			July 2022	July 2022	Added definitions section; updated the POGO Privacy and Security Governance and Accountability Organizational Chart; updated security standards for servers, network, backup and recovery due to system/process changes; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.4	Threat and Risk Assessment	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction and includes compliance and breach notification clause as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	

			June 2022	June 2022	Added definitions of agents; updated procedure section by adding details on the format of the document of security audits, where the documentation is saved and how it is communicated to senior staff.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.5	Physical/Office Security	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction and included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definitions section; added required timeframe for return of keys at end of employment; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.6	Retention, Return, and Destruction of Data	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to triennial IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definition section; updated background and re-titled to General rules related to retention,	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022	

					return and destruction section; updated retention period for research projects; and edited compliance section to make it consistent across all POGO policies.	updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.7</b>	<b>Personal Health Information on Mobile Devices</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			January 2020	January 2020	Updated SAVTI name change to The POGO School and Work Transitions Program.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review; added the clause “POGO relies upon a consent for its authority to collect, use and disclose personal health information” for the Interlink Community Cancer Nurses and The POGO School and Work Transitions Program.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added references to specific IPC Fact Sheets in Policy section; added definitions section; updated procedure section; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.8</b>	<b>Access to POGO Email on Personal Mobile Devices</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; include compliance and breach notification clause as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	

			June 2020	June 2020	Update POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			July 2022	July 2022	Terminated Policy due to discontinuing use of ActiveSync on personal mobile devices.	Not applicable.	
<b>9.2.9</b>	<b>Secure Transfer of Records of Personal Health Information</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures and change from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Removed the clause "transfer using mobile device" given disabled ability; added requirement for policy to be read in conjunction with POGO Privacy and Security Code; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.10</b>	<b>Password</b>	Part 2- Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			July 2022	July 2022	Added definitions section; included changes to password requirements; updated Password handling	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022	

					section; and edited compliance section to make it consistent across all POGO policies.	updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.11</b>	<b>Maintaining and Reviewing System Control</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definitions section; added reference to Policy 9.2.3 <i>POGO Security Standards and Procedures</i> ; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.13</b>	<b>Change Management</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			July 2022	July 2022	Added definitions section; updated the format of the documentation of changes and approval or denial process; updated the procedures when database changes made; updated patch management process; details added relating to	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	

					roles and responsibilities as well as documentation requirements for specific decisions on changes affecting the operational environment at POGO; and edited compliance section to make it consistent across all POGO policies.		
9.2.15	Acceptable Usage	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added reference to Policy 9.2.7 ( <i>Personal Health Information on Mobile Devices</i> ); added definitions section; added criteria for approval and denial; updated procedures for using electronic devices remotely; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.17	Information Security Incident Management Process	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirement; change Ministry of Health and Long-Term Care to Ministry of Health.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	

					scheduled IPC review.		
			June 2022	June 2022	Updated policy section; added Definitions section; updated the Containment section; included text for the Investigating section of the POGO Privacy Breach and Incident policy; updated the Flowchart for Notification and Action; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.19	Document Shredding	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definitions section; added timeframe for certificate of destruction; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
9.2.20	Secured Faxes	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO’s requirement to review policies and procedures from annual to once prior to each schedule IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Updated to reinforce that faxing of	July 26, 2022 - POGO Staff	

					PHI should be avoided wherever possible and other more secure means of sending PHI should be used. Policy is retained to ensure that where faxes are received and where faxes are sent out of necessity, this is done in a secure manner; and edited compliance section to make it consistent across all POGO policies.	Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.21</b>	<b>Encryption</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			January 2020	January 2020	Updated SAVTI name to The POGO School and Work Transitions Program.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Update POGO’s requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definition section; added a guidance statement in policy introduction on requirements on delivery of PHI; updated encryption checklist; and removed USB keys, CD/DVDs, project specific laptops as no longer acceptable devices; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.22</b>	<b>Telephone Messages Containing PHI</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	

					per IPC Manual requirements.		
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definition section; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.24</b>	<b>Anti-Virus/Spam</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2022	June 2022	Added definition section; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.26</b>	<b>Access to POGONIS on Weekends</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; include compliance and breach notification clause as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	

					scheduled IPC review.		
			June 2022	June 2022	Added definitions section; removed the procedure "PHI dataset may be loaded on to a POGO encrypted laptop" as no longer acceptable practice; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.27</b>	<b>Small Cell</b>	Part 2 – Security Indicators	November 2019	November 2019	Updated out of date staff titles; Included abbreviations in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures from annual to once prior to each scheduled IPC review.	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			July 2022	July 2022	Added definitions; updated the procedure for researchers; changed staff titles; updated review procedures for the Small Cell Committee in reference to new Policy 9.2.29 Re-identification; removed Small Cell Acknowledgement of Receipt form (redundant) and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>9.2.28</b>	<b>Inventory of PHI Placed in Secure Gray Bin</b>	Part 2 – Security Indicators	November 2019	November 2019	Included abbreviation in policy introduction; included compliance and breach notification clauses as per IPC Manual requirements.	January 28, 2020 - POGO Staff Training by Privacy Officer. Policy updated in POGO Public folder.	
			June 2020	June 2020	Updated POGO's requirement to review policies and procedures	January 27, 2021 - POGO Staff Training by Privacy Officer. Policy	

					from annual to once prior to each scheduled IPC review.	updated in POGO Public folder.	
			June 2022	June 2022	Added definition section; and edited compliance section to make it consistent across all POGO policies.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	
<b>NEW 9.2.29</b>	<b>Re-identification Risk Assessment</b>	Part 2 – Security Indicators	June 2022	June 2022	New policy highlighting the definition of re-identification, the level of risk, re-identification risk assessment criteria, assessment process; risk reduction techniques and documentation and compliance.	July 26, 2022 - POGO Staff Whiteboard communication by Privacy Officer to all staff re: 2022 updated Privacy/Security/ Human Resource and Organizational Policies. Policy updated in POGO Public folder.	

**Section I – Physical Security Audit Log**

Date of Audit of Agents	Date Each Recommendation Was Addressed	Recommendations Arising from Audit	The manner to which each recommendation was addressed
November 2019	Not applicable	No recommendations	Not applicable
January 2020	April 2020	1. Audit POGO staff: recommend review and update of each POGO internal agents' Acceptable Use forms and key card access.	1. Reviewed with each POGO Staff Acceptable Use forms and key card access updated form and log if required.
January 2021	April 2021	1. Audit POGO staff: recommend review and update of each POGO internal agents' Acceptable Use forms and key card access.	1. Reviewed with each POGO Staff Acceptable Use forms and key card access updated form and log if required.
April 2022	April 2022	1. Audit POGO staff: recommend review and update of each POGO internal agents' Acceptable Use forms and key card access.	1. Reviewed with each POGO Staff Acceptable Use forms and key card access updated form and log if required.
April 2022	April 2022	<ol style="list-style-type: none"> <li>1. Establish new policy and procedure for visitor sign-in given new POGO reception area coverage.</li> <li>2. Provide staff education on the new policy and procedure.</li> </ol>	<ol style="list-style-type: none"> <li>1. New policy and procedure established and implemented.</li> <li>2. Email sent to POGO staff informing them of the new Visitor-Sign in Policy and Procedure.</li> </ol>

## **Section J – Security Audit Program**

Type of Security Audit	Dates of Control and Audit Logs
<b>Review of all Security Policies and Procedures</b>	At least triennially by POGO Privacy Officer and IT team.  See: <a href="#">Section G</a> for details.
<b>POGO System/Security Audits</b>	Biweekly on Monday by POGO System & Network Analyst. (71 audits in total over the period of November 2019 to July 2022)  See: <b>POGO System Review November 2019 – December 2021</b>
<b>POGONIS Security Audits</b>	Biweekly on Tuesday by POGO Database Administrator, Analyst & Programmer. (67 audits in total over a period the period of November 2019 to July 2022)  See: <b>POGO POGONIS Security Audit Review November 2019 – December 2021</b>
<b>Threat and Risk Assessments of POGO External IP Addresses</b> ○ <b>Vulnerability</b>	Semi-annually or with scheduled system changes; conducted by POGO System & Network Analyst and reviewed by POGO Privacy Officer. (17 audits in total over a period the period of November 2019 to July 2022)  See: <b>Threat and Risk Assessments November 2019 – July 2022</b>

- There were **160** security audits completed since the prior review

**POGO System/Security Controls and Audits November 2019 – July 2022:**

Checkmark (✓) indicates which systems were audited between November 4, 2019 and July 24, 2022. The table that immediately follows the below table indicates all medium to high risk findings and resolutions implemented.

Systems security audit checklist November 2019 to July 2022														
<u>Date</u>	<u>Firewall</u>	<u>Domain Controllers</u>	<u>Email servers</u>	<u>RDP server</u>	<u>RDP Gateway</u>	<u>FTP server</u>	<u>File servers</u>	<u>Backup Server</u>	<u>AV and Software Updates server</u>	<u>UPSs</u>	<u>Virtual Hosts</u>	<u>Proxy Servers</u>	<u>Network switches</u>	<u>POGO Website</u>
	Syslog server logs	Windows Event Logs	Windows Event Logs and Antivirus alerts	Windows Event Logs	Windows Event Logs	Windows Event Logs and FTP server logs	Windows Event Logs	Windows Event Logs and Backup server alerts	SCCM server alerts	UPS alerts	Windows Event Logs and HP logs	System Console and email alerts	Network switches alerts	Wordfence plug-in alerts
11/4/2019	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11/18/2019	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
12/2/2019	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
12/30/2019	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1/13/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1/27/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2/10/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2/24/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3/9/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3/23/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4/6/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4/20/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/4/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/18/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6/1/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6/15/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

6/29/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7/13/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7/27/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7/27/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8/10/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8/24/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
9/7/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
9/21/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
10/5/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
10/19/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11/2/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11/16/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11/30/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
12/14/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
12/28/2020	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1/11/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1/25/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2/8/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2/22/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3/8/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3/22/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4/5/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4/19/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/3/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/17/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/31/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6/14/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6/28/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7/12/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7/26/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

8/9/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
8/23/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
9/6/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
9/20/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
10/4/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
10/18/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11/1/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11/15/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
11/29/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
12/13/2021	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1/10/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
1/24/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2/7/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
2/21/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3/7/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
3/21/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4/4/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
4/18/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/2/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/16/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
5/30/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6/13/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
6/27/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7/10/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓
7/24/2022	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓	✓

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**Threat and Risk Assessments November 2019 – July 2022:**

Security Audits	Review Date	Findings/Recommendations	Date Addressed	Manner Each Recommendation Addressed or Proposed Manner	Individual Accountable for Tracking Each Recommendation is Addressed
POGO System/Security Audits and Threat and Risk Assessments of POGO External IP Addresses Note: only Medium to High Risk Findings are listed					
Firewall Automated Email Alerts	12/2/2019	Scanning attacks from five IP addresses	12/2/2019	Access from these IP addresses have been denied to all POGO external resources.	System/ Network Analyst
Firewall Automated Email Alerts	4/20/2020	Scanning attacks from four IP addresses	4/20/2020	Access from these IP addresses have been denied to all POGO external resources.	System/ Network Analyst
Firewall Automated Email Alerts	5/4/2020	Scanning attacks from one IP address	5/4/2020	Access from these IP addresses have been denied to all POGO external resources.	System/ Network Analyst
FTP server External IP Addresses Vulnerability Scan	5/16/2020	Block ciphers of 64 bit block length in SSL/TLS are enabled	5/16/2020	Disabled in settings	System/ Network Analyst
REDCap server External IP Addresses Vulnerability Scan	5/17/2020	A PHP file exist in root web folder	5/17/2020	The file was removed.	System/ Network Analyst
RD Gateway server External IP Addresses Vulnerability Scan	6/1/2020	older TLS 1.0 and 1.1 enabled	6/1/2020	TLS 1.2 only enabled.	System/ Network Analyst
Email server Manual server scan	6/15/2020	Xbox services running on Exchange server	6/15/2020	Xbox services have been disabled.	System/ Network Analyst
Web server External IP Addresses Vulnerability Scan	6/29/2020	POGO web site server running unneeded services	6/29/2020	POGO website security adjusted to be PCI compliant.	System/ Network Analyst
Firewall Automated Email Alerts	7/13/2020	Scanning attacks from eight IP addresses	7/13/2020	Access from these IP addresses have been denied to all POGO external resources.	System/ Network Analyst
Firewall Automated Email Alerts	7/27/2020	Scanning attacks from one IP address	7/27/2020	Access from these IP addresses have been denied to all POGO external resources.	System/ Network Analyst

Firewall Automated Email Alerts	7/27/2020	Scanning attacks from one IP address	7/27/2020	Access from these IP addresses have been denied to all POGO external resources.	System/ Network Analyst
Firewall Manual server audit	11/30/2020	Repeated phishing attacks from a threat actor domain	11/30/2020	Domain has been blocked.	System/ Network Analyst
Email server Manual server audit	2/8/2021	Many false-positive Black List detections	2/8/2021	Email Black List provider has been replaced on POGO SPAM filter.	System/ Network Analyst
Email server Alert from vendor	3/22/2021	Urgent Microsoft alerts about HAFNIUM attack	3/22/2021	Security updates applied to Exchange server.	System/ Network Analyst
Email server Manual server audit	6/14/2021	POGO staff can connect to email from any phone	6/14/2021	Applied Quarantine policy for ActiveSync on Exchange server. Access must be allowed by administrator.	System/ Network Analyst
Web server External IP Addresses Vulnerability Scan	7/26/2021	Old unsecure PHP version running on website server	7/26/2021	PHP replaced with most current version.	System/ Network Analyst
RD Gateway server Manual server audit	6/27/2022	POGO staff use 2 users and 2 passwords for remote access	6/27/2022	Multi-Factor Authentication implemented for POGO staff remote access.	System/ Network Analyst

**POGO POGONIS Security Audit**

Date	Review Period		
2019-10-30	2019-10-08	through	2019-10-30
2019-11-19	2019-10-30	through	2019-11-19
2019-12-03	2019-11-19	through	2019-12-03
2019-12-17	2019-12-03	through	2019-12-17
2020-01-02	2019-12-17	through	2020-01-02
2020-01-14	2020-01-02	through	2020-01-14
2020-01-28	2020-01-14	through	2020-01-28
2020-02-11	2020-01-28	through	2020-02-11
2020-02-26	2020-02-11	through	2020-02-26
2020-03-11	2020-02-26	through	2020-03-11
2020-03-24	2020-03-11	through	2020-03-24
2020-04-07	2020-03-24	through	2020-04-07
2020-04-22	2020-04-07	through	2020-04-22
2020-05-07	2020-04-22	through	2020-05-07
2020-05-19	2020-05-07	through	2020-05-19
2020-06-16	2020-05-19	through	2020-06-16
2020-06-30	2020-06-16	through	2020-06-30
2020-07-14	2020-06-30	through	2020-07-14
2020-07-29	2020-07-14	through	2020-07-29
2020-08-17	2020-07-29	through	2020-08-17
2020-08-26	2020-08-17	through	2020-08-26
2020-09-08	2020-08-26	through	2020-09-08
2020-09-23	2020-09-08	through	2020-09-23
2020-10-13	2020-09-23	through	2020-10-13
2020-10-21	2020-10-13	through	2020-10-21
2020-11-03	2020-10-21	through	2020-11-03
2020-11-25	2020-11-03	through	2020-11-25
2020-12-18	2020-11-25	through	2020-12-18

2021-01-06	2020-12-18	through	2021-01-06
2021-01-14	2021-01-06	through	2021-01-14
2021-01-26	2021-01-14	through	2021-01-26
2021-02-09	2021-01-26	through	2021-02-09
2021-02-23	2021-02-09	through	2021-02-23
2021-03-11	2021-02-23	through	2021-03-11
2021-03-26	2021-03-11	through	2021-03-26
2021-04-06	2021-03-26	through	2021-04-06
2021-04-30	2021-04-06	through	2021-04-30
2021-05-05	2021-04-30	through	2021-05-05
2021-05-21	2021-05-05	through	2021-05-21
2021-06-15	2021-05-21	through	2021-06-15
2021-07-13	2021-06-15	through	2021-07-13
2021-07-27	2021-07-13	through	2021-07-27
2021-08-12	2021-07-27	through	2021-08-12
2021-09-07	2021-08-12	through	2021-09-07
2021-09-30	2021-09-07	through	2021-09-30
2021-10-15	2021-09-30	through	2021-10-15
2021-10-29	2021-10-15	through	2021-10-29
2021-11-26	2021-10-29	through	2021-11-26
2021-12-06	2021-11-26	through	2021-12-06
2021-12-20	2021-12-06	through	2021-12-20
2022-01-04	2021-12-20	through	2022-01-04
2022-01-11	2022-01-04	through	2022-01-11
2022-01-25	2022-01-11	through	2022-01-25
2022-02-03	2022-01-25	through	2022-02-03
2022-02-11	2022-02-03	through	2022-02-11
2022-02-25	2022-02-11	through	2022-02-25
2022-03-08	2022-02-25	through	2022-03-08
2022-03-28	2022-03-08	through	2022-03-28

2022-04-05	2022-03-28	through	2022-04-05
2022-04-21	2022-04-05	through	2022-04-21
2022-05-03	2022-04-21	through	2022-05-03
2022-05-17	2022-05-03	through	2022-05-17
2022-06-02	2022-05-17	through	2022-06-02
2022-06-15	2022-06-02	through	2022-06-15
2022-06-27	2022-06-15	through	2022-06-27
2022-07-18	2022-06-27	through	2022-07-18
2022-07-26	2022-07-18	through	2022-07-26

**Other Security Audits November 2019 – July 2022:**

Security Audits	Review Date	Findings/Recommendations	Date Addressed or Proposed	Manner Each Recommendation Addressed or Proposed Manner
POGONIS Security Audit (Note: non-suspicious findings are not listed)				
POGONIS	7/2/2019	1. POGONIS platform upgrade to Windows 16 or later and database version upgrade to Oracle 18.	The upgrade of the servers were tested and completed by May 8, 2021	1. Operating systems have been upgraded to Windows 19. POGONIS database servers have been updated to Oracle 18c.
AfterCare Application	7/20/2021	1. Implement audit log to monitor logins.	7/27/2021	1. Updated application code to capture date/time of user login.
AfterCare Application	7/20/2021	1. Implement security alerts to audit process to flag potential after-hours login anomalies.	7/30/2021	1. Implemented code to query database for unusual after hours login activity for admin review.
Financial Assistance Database	1/17/2022	1. Implement security alerts to audit process to flag potential after-hours login anomalies.	1/24/2022	1. Updated application to flag and alert admin user of potentially suspicious after hour's login.

**Section K – Human Resources Communications Log**

Date	Nature of Communications to Agents
December 2019	Email to internal agents about <b>POGO policy update: Website Privacy &amp; Google</b> relating to aligning user tracking and analytics with industry standards including opt-out option.
January 28, 2020	<p>Privacy team provided a special privacy presentation “Data Privacy Day Workshop “ on January 28, 2020 highlighting the following privacy related topics:</p> <ul style="list-style-type: none"> <li>• <i>Recent IPC Indicators document and recommendations; Privacy Office planned best practice reviews, Decision 102; privacy and security audits program; and privacy program inquires and statistics.</i></li> </ul>
January 2020	Email to internal agents about <b>POGO policy update – Communication</b> to inform team that incoming external emails now have a notice to highlight they are external and to remind them not to click links or open attachments unless they recognize the sender and know the content is safe.
February 2020	Email about POGO policy update to 9.4.10 Email Policy requesting internal agents review the updated policy that reflects new approach to flagging external emails.
February 2020	<p><b>POGO Interlink Community Cancer Nurses – updated Interlink Consent Form</b></p> <p>An <b>updated version of the Interlink Consent form</b> was emailed to the Interlink Nurses noting changes made to this form (update of the current Privacy Office contact information and branding).</p>
March 2020	<p><b>Teleconferencing Training</b></p> <p>Email update to internal agents to provide information about how to protect sensitive information during telephone and video conferencing, including a guideline document, “VIDEO CONFERENCING / TELECONFERENCE ACCOUNT INFO AND GUIDELINES”.</p>
March 2020	March 2020 Privacy Highlight - <b>Why You Should Always Lock Your Computer</b> : Email communication to internal agents explaining why internal agents should always lock their computer when they walk away from their desk.
April 2020	<p><b>New Powers to Issue Administrative Penalties Among Significant Amendments to PHIPA</b></p> <p>A link was emailed to POGO Internal Agents to read further about the new powers and significant amendments to PHIPA.</p>
April 2020	Spam filter tip emailed to internal agents to explain how to use <b>Email Quarantine Digest</b>
May 2020	Email to all internal agents to advise that <b>POGO Privacy Office has a new email address (privacy @pogo.ca)</b> and to remind them that if external agents ask for privacy, please have them visit the privacy webpage and use the new email.

Date	Nature of Communications to Agents
May 2020	<b>Logging Out</b> Email reminder to internal agents to remind them to log out of accounts to prevent unauthorized access.
May 2020	<b>Use Strong Passwords (Policy # 9.2.10 Password)</b> Email reminder to internal agents to remind them to use strong passwords and never to share passwords.
May 2020	<b>Cookies (Policy # 9.2.1 Information Security Policy)</b> Email reminder to internal agents to clear cookies and browser history on a regular basis.
May 2020	<b>Software (Policy # 9.2.3 Security Standards and Procedures )</b> A communication was sent to the Internal POGO agents to update all software regularly at the request of the Systems & Network Analyst.
June 2020	<b>Zoom Video/Teleconferencing Launch – Guidelines emailed to Internal Agents about securing recordings of video meetings.</b>
June 2020	<b>Zoom Update- Email communication to internal agents about implementation of Zoom Healthcare</b> and a reminder to review meeting recording guidelines and acknowledge having done so.
June 2020	<b>Click links from trusted sources</b> Email reminder to internal agents to be cautious about clicking links in emails.
June 2020	<b>SPAM email</b> Email to Internal Agents about how to handle emails with the subject “[SPAM] Mailbox termination Alert for your email address”
June 2020	<b>Tips and Tricks from the Privacy and Security Team – Online privacy and security</b> Email to internal agents with link to webinar about privacy and security trends. Learn about some simple, key actions that POGO’s Privacy and Security Team is taking to keep POGO’s data and POGO itself secure, and to ward off all kinds of attacks during this challenging time.
August 2020	<b>Phishing Alert</b> Reminder: It’s getting harder to distinguish phishing messages from the real thing!
August 2020	<b>Reminder: Watch out for phishing, part 2</b>  What to look for in phishing messages:

Date	Nature of Communications to Agents
	<ul style="list-style-type: none"> <li>Email address – usually a giveaway but they are getting cleverer at creating these.</li> <li>Language, grammar and typos although the latter is less reliable these days.</li> </ul> <p>If you're not the main account holder for the software, do not answer. Requests for any updates or info will always be sent to the person on file.</p>
September 2020	<p><b>PIA Training for POGO Internal Agents (Policy # 9.1.14 Privacy Impact Assessment)</b></p> <p>POGO Internal Agents received a PIA Training session on how to complete their annual PIA's on their data holdings, programs and new initiatives and projects.</p>
September 2020	<p><b>Right to Know Week ( Policy # 9.3.1 Privacy and Security Training Policy)</b></p> <p>Privacy sent a communication to POGO Staff speaking to Canada's celebrating <a href="#">Right to Know Week</a> to raise awareness of an individual's right to access government information, while promoting freedom of information as essential to both democracy and good governance</p>
September 2020	<p><b>Information Privacy Commissioner of Ontario (IPC)</b></p> <p>Privacy sent an email communication to POGO Internal Agents. Ontario has a new Information Privacy Commissioner of Ontario (IPC), Patricia Kosseim.</p>
October 2020	<p><b>External Confidentiality Agreement communicated to POGO Interlink Community Cancer Nurses during their Training session (Policy # 9.3.2 Confidentiality and Non-Disclosure Agreement)</b></p> <p>In the annual Privacy meeting POGO Interlink Community Cancer Nurses (POGO External agents) were given an update to review and sign their annual external confidential agreement for POGO.</p>

Date	Nature of Communications to Agents
October 2020	<p><b>October Communication via Whiteboard - Cybersecurity</b></p> <p>October is Cybersecurity Awareness Month! Whiteboard communication will feature resources, hints and tips all month, courtesy of the Privacy and Security team.</p> <p>Reminder that if you receive “weird emails” due to hacking or phishing attacks (such as payments asking for your bank account information), remember to be extra vigilant and careful of what you are opening (link) in the email. If you are not sure, do not click on the link.</p> <p>Here is a great 3-minute video on ransomware and cybersecurity topics (link provided). Once you have reviewed the video, please email the Privacy Office to let them know you have completed watching the video.</p> <p><b>Cybersecurity Month – Tip</b></p> <p>POGO Internal agents are reminded to keep confidential information safe and secure and to change their password on Zoom or other shared accounts when team members or students leave POGO (Policy # 9.2.10).</p> <p>A tips sheet was sent to POGO Internal Agents for information from the Network Systems Analyst to protect POGO Internal Agents from ransomware:</p> <p>More on cybersecurity from POGO’s Privacy and Security Team.</p> <p>The IPC has sent out their link on Cybersecurity Awareness Month – Read Twice, Click Once! (links provided).</p> <p>Cybersecurity Month-Tip about Zoom recordings from the Privacy and Security Team: refer to the Zoom Video-Teleconferencing Guidelines.</p>
October 2020	<p><b>IT Update</b></p> <p>An email communication sent by POGO IT team and Communications announcing the updated “How to Access your POGO Email via Web Browser” document.</p>
October 2020	<p><b>A Message From the Privacy Office - It's Time to Update and/or Create a new PIA for 2020! (Policy # 9.1.14)</b></p> <p>The POGO Privacy Office sent an email communication to POGO Internal Agents to update and/or create a new PIA for 2020 with directions and guidance on how to do so.</p>
November 2020	<p><b>Approval for POGO’s Triennial Audit</b></p>

Date	Nature of Communications to Agents
	An email communication was sent to POGO Internal Agents following POGO’s triennial audit, POGO’s special status under the information privacy legislation has been approved for a further three years by Ontario’s Information and Privacy Commissioner!
<b>December 2020</b>	<p><b>Reminder from the POGO Privacy Office</b></p> <p>An email communication was sent to the POGO Internal Agents to review a video on ransomware and cybersecurity topics. Once the POGO Internal Agents reviewed, Internal Agents emailed the POGO Privacy Office of its completion.</p>
<b>January 2021</b>	<p><b>Whiteboard communication: Coming Soon: Data Privacy Day</b></p> <p>A communication via email was sent to POGO Internal Agents speaking to “Data Privacy Day”.</p> <p><b><u>What is Data Privacy Day?</u></b> Data Privacy Day is an international event that occurs every January 28. The purpose of Data Privacy Day is to raise awareness and promote privacy and data protection best practices.</p> <p><b><u>How will POGO celebrate Data Privacy Day?</u></b> Please join the Privacy Office for your annual privacy training as they host a lunch and learn (12 to 1 pm) on January 27, 2021 on Zoom. You will learn more about:</p> <ul style="list-style-type: none"> <li>• Information Privacy Commissioner of Ontario (IPC) triennial audit of POGO’s Prescribed Entity Status</li> <li>• IPC and Working From Home</li> <li>• Privacy Program Updates</li> <li>• Privacy in the Wake of COVID-19</li> <li>• Cybersecurity</li> <li>• Social Media Tips and Tricks</li> </ul>
<b>January 2021</b>	<p><b>Consultation on IPC Strategic Priorities for the next 5 years</b></p> <p>An email communication was sent to POGO Internal Agents speaking to The Information and Privacy Commissioner of Ontario (IPC) is conducting a <a href="https://www.ipc.on.ca/about-us/ipc-strategic-priority-setting-consultation/">consultation on strategic priorities</a> for the next 5 years. POGO’s privacy team contributed POGO’s views on priorities such as enabling responsible use of data for access and privacy rights for children and youth and building trust in a virtual healthcare system, which respects privacy.</p>
<b>March 2021</b>	<p><b>Email update from Systems &amp; Network Analyst and Privacy – New spam filter feature implemented at POGO: “POGO Email Quarantine Digest” (Policy # 9.4.10 Email)</b></p>

Date	Nature of Communications to Agents
March 2021	<p><b>Clarification of Definition - "POGO Internal Agent"</b></p> <p>An email communication was sent to the POGO Internal Agents clarifying the definition of the POGO Internal Agent.</p>
April 2021	<p><b>Fraud Prevention Tips</b></p> <p>The POGO Privacy Program and Systems &amp; Network Analyst emailed POGO Staff to share the Information Privacy Commissioner's (IPC) first podcast in <a href="#">Protect Yourself Against Phishing and Other Types of Cyber Attacks</a>.</p>
April 2021	<p><b>POGO Privacy Training delivered to POGO Pediatric Interlink Community Cancer Nurses and POGO Privacy resources provided.</b></p>
May, 2021	<p><b>Adjust privacy settings</b></p> <p>An email communication sent to POGO staff to remind them to adjust privacy settings of Social Media accounts and lock down their accounts to protect their privacy.</p>
May 2021	<p><b>News from the Privacy team about IPC priorities consultation</b></p> <p>In the January 15 Whiteboard communication, Privacy spoke about how the Information and Privacy Commissioner of Ontario (IPC) is conducting a <a href="https://www.ipc.on.ca/about-us/ipc-strategic-priority-setting-consultation/">consultation on strategic priorities (https://www.ipc.on.ca/about-us/ipc-strategic-priority-setting-consultation/)</a> for the next 5 years. POGO's privacy team contributed POGO's views on priorities, such as enabling responsible use of data for good, access and privacy rights for children and youth, and building trust in a virtual healthcare system, which respects privacy.</p>
May 2021	<p><b>Email communication sent as a Zoom Meeting Refresher and Reminder</b></p>
June 2021	<p><b>External POGO Privacy Training Refresh for Financial Assistance Program Staff - Please review and acknowledge by June 30, 2021</b></p>
June 2021	<p><b>Virtual Visits Guidelines for the POGO School and Work Transitions Program Staff was communicated and presented to the POGO Counsellors</b></p>
July 2021	<p><b>Email communication sent to POGO Staff to listen to IPC Podcast: "Teaching Kids About Privacy"</b></p>
August 2021	<p><b>Privacy Teams training with New Board Member – The future of Privacy at POGO</b></p>

Date	Nature of Communications to Agents
August 2021	<p data-bbox="486 269 1104 306"><b>Privacy and Confidentiality Definitions – Refresher</b></p> <p data-bbox="486 342 2228 410">Privacy Program sent an email communication to update POGO Staff on privacy definitions that are important to POGO and important for you to know in your day-to-day work. Please review the five definitions below.</p> <ul data-bbox="540 451 991 630" style="list-style-type: none"> <li data-bbox="540 451 991 483">• Personal Health Information (PHI)</li> <li data-bbox="540 488 930 521">• Confidential Information (CI)</li> <li data-bbox="540 526 889 558">• Personal Information (PI)</li> <li data-bbox="540 563 774 596">• Internal Agents</li> <li data-bbox="540 600 774 633">• External Agents</li> </ul>
August 2021	<p data-bbox="486 672 2228 740"><b>Whiteboard communication: From the Privacy Team: Information and Privacy Commissioner of Ontario Podcast: Putting Patient Trust at the Centre of Virtual Health</b></p>
August 2021	<p data-bbox="486 781 2228 849"><b>Whiteboard communication: How to Use your File Transfer Protocol (FTP) Account for Sending and Receiving Files – Refresher (<i>Policy # 9.2.9 Secure Transfer of Records of Personal Health Information</i>)</b></p>
September 2021	<p data-bbox="486 889 1024 927"><b>Tip and Reminder from POGO Privacy Team</b></p> <p data-bbox="486 963 2153 1031">Privacy sent an email highlighting a recent complaint received by The Information Privacy Commissioner of Ontario (IPC). Please review the guidelines (internal link).</p>
September 2021	<p data-bbox="486 1070 1220 1107"><b>Whiteboard Communication: First Nations data sovereignty</b></p> <p data-bbox="486 1143 2228 1211">As we begin our preparations for the National Day for Truth and Reconciliation coming up on Sept 30<sup>th</sup>, the POGO Privacy Office shares this about First Nations data sovereignty <a href="#">podcast</a> from the Information and Privacy Commissioner.</p>
September 2021	<p data-bbox="486 1250 1521 1287"><b>Whiteboard communication: 2021 Right to Know Week (September 27 to October 4)</b></p> <p data-bbox="486 1292 2099 1354">This week and the Sept. 28, 2021 International Right to Know Day are intended to raise global awareness of individuals' right to access government information and to promote access to information as a fundamental right. Link provided.</p>

Date	Nature of Communications to Agents
September 2021	<b>Whiteboard communication: Zoom Meeting Change – Passwords (<i>Policy # 9.2.10 Passwords</i>)</b> - password will no longer be required to join a POGO Zoom video meeting but host will still be required to admit participants, a step that ensures POGO maintains the privacy and security of the meeting.
October 2021	<b>Whiteboard Communication: October is Cybersecurity Awareness Month</b>
October 2021	<p><b>Whiteboard Communication; Cybersecurity Month</b> <b>October 4-8</b></p> <p>Week 1: Staying in touch No matter what's going on around us, the internet keeps us in touch and spending time with our favourite people. This week, stay safe by:</p> <ul style="list-style-type: none"> <li>• Avoiding phishing scams. Click on the <a href="#">IPC link</a> for more information.</li> <li>• Keeping private information private</li> <li>• Using strong passphrases and complex passwords and enabling multi-factor authentication (MFA)</li> </ul> <p>Contact the Systems &amp; Network Analyst for more information.</p>
October 2021	<p><b>Whiteboard Communication; Cybersecurity Month - Week 2: Sharing special moments</b></p> <p>We're not always able to be around for the big things in life, but the internet has made it easier to share in those moments even when we can't be there in person. From the video of your baby's first steps to photos of their graduation, share special moments safely by undertaking practices like we do here at work:</p> <ul style="list-style-type: none"> <li>• Staying safe while file sharing</li> <li>• Avoiding malware and using antivirus software</li> <li>• Storing and backing up data</li> </ul> <p>Contact the Systems Network Analyst for more information.</p> <p><b>Reminder – Always Lock your Computer Screen</b></p> <p>Always remember to lock your computer screen when you leave your desk whether at home or in the office, even for a brief time. Please review the guidelines. (Internal Link)</p> <p>Any further questions, contact the POGO Privacy Team.</p>

Date	Nature of Communications to Agents
October 2021	<p><b>Whiteboard Communication; Cyber Security Awareness Month Week 3: Working Remotely and Networking Safely</b></p> <p>The internet has allowed many Canadians to work remotely over the past year and a half. Click for tips about how to continue working from home safely by:</p> <ul style="list-style-type: none"> <li>• Using Wi-Fi safely</li> <li>• Setting up a secure home network</li> <li>• Addressing workplace and career-specific cyber threats</li> </ul> <p>Contact the Systems &amp; Network Analyst for more information.</p>
October 2021	<p><b>Whiteboard Communication; Cybersecurity Awareness Month Week 4: Families and businesses</b> This past year has been a difficult one for many Canadians, but two groups have faced unique challenges: kids (who missed school, friends and activities) and businesses (who had to shift suddenly from business as usual). Read more about how to keep things safe including by:</p> <ul style="list-style-type: none"> <li>• Keeping kids and families safe online</li> <li>• Running a cyber-safe business</li> </ul> <p>Contact the Systems Network Analyst for more information.</p> <p>Thank you to the Privacy and Security Team for the tips this month and for regularly including tips on the whiteboard.</p>
December 2021	<p><b>Whiteboard Communication: For Action - Phase I Paper Purging Initiative (Policy # 9.2.19 Document Shredding)</b> – reminder on the proper way to dispose of confidential documents.</p>
January 2022	<p><b>Internal Agents Privacy Training</b></p>
January 2022	<p><b>Annual Privacy Training to the Board including IPC Resources</b></p>
January 2022	<p><b>Whiteboard Communication: Information and Privacy Commissioner of Ontario (IPC) - Data Privacy Day Jan 28 - Children and Youth in a Digital World</b></p> <p>(Virtually) join the IPC on Data Privacy Day! Commissioner Kosseim will be joined by Matthew Johnson from Media Smarts and a panel of experts for a free webcast on Data Privacy Day, January 28, 2022 at 9:30 am, “Empowering a New Generation of Digital Citizens.” Get more information and register <a href="#">here</a>.</p>
January 2022	<p><b>Annual AfterCare Privacy Training</b></p>

Date	Nature of Communications to Agents
February 2022	Annual Interlink Nurses Privacy Training
March 2022	Annual POGO Satellite Clinic Nurses and/or Satellite Program Database End-Users
April 2022	<p><b>Whiteboard Communication: Reminders from the POGO Privacy Office (<i>Policy 9.2.18 Confidentiality and Security of Data</i>) now that we are returning to office.</b></p> <p>When in the office</p> <ul style="list-style-type: none"> <li>• Keep your POGO access badge and keys with you at all times. If you lose your badge, contact the POGO Privacy Office immediately.</li> </ul> <p>Remote or in-office</p> <ul style="list-style-type: none"> <li>• As applicable, lock your filing cabinets, doors and computer (CTRL ALT DEL) when you are away from your workspace.</li> <li>• Don't leave any confidential documentation on your desk.</li> <li>• Use a space where you cannot be overheard for confidential discussions. In the office, find an office or meeting room.</li> <li>• When others are in earshot, be conscious of what is said and how loudly you speak.</li> </ul> <p>Remember to keep an excellent privacy culture going in both your remote and in-office work environments! Contact the POGO Privacy Office if you have any questions.</p>
May 2022	<p><b>From Director of Administration and Privacy: All Staff email communication: Multi-Factor authentication deployment for Office 365 sign-on.</b></p> <p>POGO is moving to Office 365 cloud services for emails. This is a multiple step process including establishing new method on authentication (sign-on) before migrating all emails. The first step introduces MFA (multi-factor authentication).</p>
July 2022	<p><b>POGO Whiteboard: new visitor sign in process (<i>Policy # 9.1.24 POGO Visitor Sign In</i>)</b></p> <p>From the Privacy Team: POGO's Visitor Sign-in and Visitor Identification has Changed. Link to policy provided.</p>
July 2022	<p><b>POGO Whiteboard (What is "de-identification"? (<i>Policy #9.1.13 De-Identifying Personal Health Information</i>))</b></p> <p>De-identification – A POGO Privacy update. Link provided.</p> <p>For reference, see <a href="#">this blog</a> from the Privacy Commission about PHIPA Decision 175, an investigation into the sale of de-identified data by a health information custodian to a third-party corporation.</p>
July 2022	<p><b>POGO Whiteboard: Freedom of Information Act and access to information rights. (<i>Privacy and Data Security Code, Principle 9 Individual Access</i>)</b></p>

Date	Nature of Communications to Agents
	Check out the IPC podcast on <a href="#">Power to the people! Access, privacy and civic engagement</a> .
July 2022	<p><b>POGO Whiteboard: (POGO 2023 Triennial IPC Audit Report)</b>  POGO has recently reviewed and amended many policies and procedures for Privacy, Security, Human Resources and Organizational sections. These and other important Privacy documents can be found in the following Public folder.  If you have any questions, please email the privacy office.</p> <p>Please see below message from the Commissioners blog:  <b><u>Say good-bye to email blunders and let's resolve to do better in 2022! (Patricia Kosseim, Information and Privacy Commissioner of Ontario)</u></b>. Click <a href="#">here</a> to read Commissioner's Kosseim own email blunder, what her office says about misdirected emails and what we can do to solve them for now and in the future!</p>

**Section L: Glossary and Policies**

Acronyms	Description
<b>ACTS Database</b>	AfterCare Treatment Summary (ACTS) software that uses complex algorithms to generate risks and recommendations tailored to individual survivors based on their treatments history.
<b>Agents (Internal and External)</b>	<p>Internal Agents include employees, students, and volunteers <b><i>who are provided with a POGO network account</i></b> and engaged in work for, or on behalf of POGO.</p> <p>External Agents include researchers, Interlink Community Cancer Nurses, POGO Data Managers, AfterCare Data Managers, POGO Financial Assistance Program Data Managers, POGO Counsellors, Board of Directors or other external POGO associates or third party service providers conducting business for or on behalf of POGO.</p>
<b>Data Security Committee</b>	The POGO committee that reviews and approves new and amended privacy and security policies and procedures, and works directly with the Privacy Officer regarding privacy questions, issues, breaches, or other privacy matters.
<b>Information Technology (IT) Team</b>	Includes the Senior Database Administrator, and Database and System and Network Administrators/Analysts/Programmers.
<b>POGO Interlink Nursing Program</b>	POGO Interlink Nurses coordinate cancer care for children by linking hospital and community services.
<b>POGO Financial Assistance Program</b>	Financial assistance for out-of-pocket costs when a child is in treatment, and that covers a portion of food costs, accommodation when away from home, and care for siblings under 12.
<b>POGO AfterCare Program Hospitals</b>	The hospitals that provide long-term follow up for pediatric cancer survivors as part of the POGO funded AfterCare Program.
<b>POGO Satellite Community Hospitals</b>	Hospitals that provide components of the cancer treatment and care in community hospitals as part of the POGO-funded Satellite Program.
<b>POGO Tertiary Pediatric Oncology Hospital Partners</b>	The five pediatric teaching hospitals in Ontario that diagnose and treat pediatric oncology cases.

<b>POGONIS Database</b>	POGO's Networked Information System collects demographic, diagnostic, treatment and outcomes for all cases of childhood cancer in Ontario.
<b>Prescribed Entities</b>	An organization designated as a Prescribed Entity under section 45(1) of the <i>Act</i> .
<b>Privacy and Data Security Code</b>	The 10 tenets of POGO's Privacy Program.
<b>Privacy and Data Security Procedures</b>	The procedures that follow the 10 tenets of POGO's Privacy Program.
<b>Privacy and Security Policies and Procedures (the Manual)</b>	A Manual that consists of <i>POGO Privacy and Data Security Code and POGO Privacy and Data Security Procedures</i> .
<b>Privacy Team</b>	Includes the POGO Privacy Officer and the Associate Privacy Officer.
<b>The Privacy Program</b>	Refers to POGO's Privacy Program that consists of the following organizational and administrative materials including: <i>POGO Privacy and Data Security Code, POGO Privacy and Data Security Procedures, POGO's Security Standards, POGO Privacy and Security Audit Program, Privacy Impact Assessment, Privacy Training, Privacy Complaint Programs, POGO's Privacy and Security Governance and Accountability Framework, POGO's Business Continuity and Disaster Recovery Plan, and POGO's Corporate Risk Management Framework</i> .
<b>Third Party Service Provider</b>	Is an organization that provides services to POGO pursuant to a third party service agreement. The third party service provider is an agent of POGO except in circumstances where the service is POGO – supervised shredding (disposal) of secured PHI records and does not involve access or use of PHI by the organization.
<b>The POGO School and Work Transitions Program</b>	The POGO program that provides survivors with guidance and information as they transition to higher education or to the workforce.

**Listing of POGO Policy Numbers and Titles:**

**POGO Polices – Policy Numbers and Policy Titles (IPC 2022)**

**9.1 Privacy Policies**

<b>Policy Number</b>	<b>Policy Title</b>
9.1.1	Process for 44 and 45 Projects
9.1.2	Review of Privacy and Security Policies and Procedures
9.1.3	Transparency of Privacy Policies, Procedures and Practices
9.1.4	Collection of Personal Health Information
9.1.5	Data Holdings Containing Personal Health Information
9.1.6	Levels of Access Policy
9.1.7	Use of Personal Health Information for Research
9.1.8	Disclosure of Personal Health Information for Purposes Other than Research
9.1.9	Disclosure of Personal Health Information for Research Purposes and the Execution of Research Agreements
9.1.10	Execution of Data Sharing Agreements
9.1.11	Template for Agreement with Third Party Service Providers
9.1.12	Linkage of Records of Personal Health Information
9.1.13	De-Identifying Personal Health Information
9.1.14	Privacy Impact Assessment
9.1.15	Privacy Audits
9.1.16	Privacy Breach and Incident Management
9.1.17	Privacy Inquires, Challenges and Complaints
9.1.18	Access to Records by the Public
9.1.19	Ethics Review Process for POGO
9.1.20	Privacy and Security Policies for Ontario Telemedicine Network
9.1.21	Interlink Patient Care Plan
9.1.22	POGO Financial Assistance Program
9.1.23	The POGO School and Work Transitions program Mobile Phones and Personal Health Information
9.1.24	POGO Visitor Sign-In

## 9.2 Security Policies

Policy Number	Policy Title
9.2.1	Information Security Policy
9.2.2	Ongoing Review of Security Policies, Procedures and Practices
9.2.3	Security Standards and Procedures
9.2.4	Threat and Risk Assessment
9.2.5	Physical-Office Security Policy
9.2.6	Retention, Return and Destruction of Data
9.2.7	Personal Health Information on Mobile Devices
9.2.9	Secure Transfer of Records of Personal Health Information
9.2.9	Secure Transfer of Records of Personal Health Information external use
9.2.10	Password
9.2.11	Maintaining Reviewing System Control and Audit
9.2.13	Change Management
9.2.15	Acceptable Usage
9.2.17	Information Security Incident Management Process Policy
9.2.19	Document Shredding
9.2.20	Secured Faxes
9.2.21	Encryption
9.2.22	Telephone Messages Containing Personal Health Information
9.2.24	Anti-Virus Spam
9.2.26	Access to POGONIS on Weekends
9.2.27	Small Cell
9.2.28	Inventory of Personal Health Information in secure bin
9.2.29	Re-identification Risk Assessment

### 9.3 Human Resources Policies

Policy Number	Policy Title
9.3.1	Privacy and Security Training Policy
9.3.2	Confidentiality and Non-Disclosure Agreement
9.3.3	Delegation of Roles and Responsibilities
9.3.4	Termination or Cessation of Employment or Contractual Relationship
9.3.6	Disciplinary Action- Privacy Breach
9.3.26	Remote Access

### 9.4 Organizational Policies

Policy Number	Policy Title
9.4.1	Privacy and Security Governance and Accountability Framework
9.4.3	Terms of Reference for Committees with Roles with Respect to the Privacy and Security Program
9.4.4	Corporate Risk Management
9.4.5	Corporate Risk Register
9.4.6	Consolidated Log of Recommendations
9.4.7	Business Continuity and Disaster Recovery Plan
9.4.10	Email Policy
9.4.12	BCDR Plan Essential Services