

IPC 2011 Triennial Review - Requested Human Resources Documentation			
Req.	Minimum Content of Required Documentation	Page Ref# in Manual	Req't Met
1	Policy and procedures for privacy training and awareness		
	• A policy and procedures must be developed and implemented requiring agents of CCO to attend initial privacy orientation as well as ongoing privacy training.	105	✓
	• The policy and procedures:	105	
	• the time frame agents must complete the initial privacy orientation	105	✓
	• address the frequency of ongoing privacy training	105	✓
	• complete the initial privacy orientation prior to being given access to PHI	105	✓
	• attend ongoing privacy training provided by CCO on an annual basis.	105	✓
	• identify the agent(s) responsible for preparing and delivering the initial privacy orientation and ongoing privacy training	105	✓
	• the process that must be followed in notifying the agent(s) responsible for preparing and delivering the initial privacy orientation	105	✓
	• include a discussion of the agent(s) responsible for providing notification	105	✓
	• time frame within which notification must be provided	105	✓
	• the format of the notification	105	✓
	• the content of the initial privacy orientation to ensure that it is formalized and standardized.	105	✓
	• require the initial privacy training to include:	105	
	• A description of the status of CCO under the Act	105	✓
	• the nature of the PHI collected and from whom this information is typically collected	105	✓
	• the purposes for which PHI is collected and used and how this collection and use is permitted by the Act and its regulation	105	✓
	• Limitations placed on access and use of PHI by agents	105	✓

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	<ul style="list-style-type: none"> the procedure that must be followed when an agent is requested to disclose PHI 	105	✓
	<ul style="list-style-type: none"> An overview of the privacy policies, procedures and practices that have been implemented by CCO 	105	✓
	<ul style="list-style-type: none"> The consequences of breaches 	105	✓
	<ul style="list-style-type: none"> An explanation of the privacy program 	106	✓
	<ul style="list-style-type: none"> The safeguards implemented by CCO to protect PHI 	106	✓
	<ul style="list-style-type: none"> The duties and responsibilities when implementing the safeguards put in place by CCO 	106	✓
	<ul style="list-style-type: none"> A discussion of the nature and purpose of the Confidentiality Agreement that agents must execute and the key provisions of the Confidentiality Agreement 	106	✓
	<ul style="list-style-type: none"> An explanation of the Policy and Procedures for Privacy Breach Management 	106	✓
	<ul style="list-style-type: none"> duties and responsibilities when involved with privacy breaches. 	106	✓
	<ul style="list-style-type: none"> The policy and procedure shall require: 	106	
	<ul style="list-style-type: none"> the ongoing privacy training to be formalized and standardized 	106	✓
	<ul style="list-style-type: none"> role-based training 	106	✓
	<ul style="list-style-type: none"> any new privacy policies, procedures and practices and significant amendments to existing privacy policies 	106	✓
	<ul style="list-style-type: none"> ongoing privacy training must have regard to any recommendations with respect to privacy training made in PIAs, privacy audits and the investigation of privacy breaches and privacy complaints 	106	✓
	<ul style="list-style-type: none"> that a log be maintained to track attendance at the initial privacy orientation 	106	✓
	<ul style="list-style-type: none"> that a log be maintained to track ongoing privacy training 	106	✓

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	<ul style="list-style-type: none"> An outline of the process to be followed in tracking attendance at the initial privacy orientation 	106	✓
	<ul style="list-style-type: none"> the documentation that must be completed, provided and/or executed to verify attendance at initial and ongoing privacy training, the agent(s) responsible for doing so; the agent to whom this documentation must be provided; and the required content of the documentation. 	106	✓
	<ul style="list-style-type: none"> identify the procedure to be followed and the agent(s) responsible for identifying the agent(s) who do not attend the initial or ongoing training and for ensuring such agent(s) attend the training, including the time frame following the date of the privacy orientation or the ongoing privacy training within which this procedure must be implemented 	106	✓
	<ul style="list-style-type: none"> address where documentation related to attendance at the initial privacy orientation and the ongoing privacy training is to be retained 	106	✓
	<ul style="list-style-type: none"> policy and procedure shall: 	107	
	<ul style="list-style-type: none"> discuss the other mechanisms implemented by CCO to foster a culture of privacy 	107	✓
	<ul style="list-style-type: none"> to raise awareness of the privacy program 	107	✓
	<ul style="list-style-type: none"> discuss the frequency with which CCO communicates with its agents in relation to privacy 	107	✓
	<ul style="list-style-type: none"> the method and nature of the communication 	107	✓
	<ul style="list-style-type: none"> the agent(s) responsible for the communication 	107	✓
	<ul style="list-style-type: none"> compliance with the policy and procedure is required 	107	✓

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	<ul style="list-style-type: none"> • stipulate that compliance will be audited 	107	✓
	<ul style="list-style-type: none"> • require agents to notify CCO if an agent believes there may have been a breach of this policy or its procedures. 	107	✓
	<ul style="list-style-type: none"> • Amend the Privacy Training and Awareness Procedures to make explicit that agents must receive privacy training prior to being given access to PHI 	2008 Recom	✓
	<ul style="list-style-type: none"> • Clarify in the Privacy Training and Awareness Procedures that contractors and consultants also receive annual privacy training 	2008 Recom	✓
	<ul style="list-style-type: none"> • Amend the Privacy Training and Awareness Procedures to state that consultants and contractors are required to sign a Privacy Acknowledgement or WTIO Privacy Acknowledgement 	2008 Recom	✓
	<ul style="list-style-type: none"> • Amend the Privacy Training and Awareness Procedures to state the consequences imposed on consultants and contractors for failing to attend privacy training and failing to execute a Privacy Acknowledgement or WTIO Privacy Acknowledgement 	2008 Recom	✓
	<ul style="list-style-type: none"> • Amend the Privacy Acknowledgement or WTIO Privacy Acknowledgement to state that immediate notification of a breach or suspected breach to a Privacy Office or a WTIO Privacy Lead is required. 	2008 Recom	✓
2	Log of attendance at initial privacy orientation and ongoing privacy training		
	<ul style="list-style-type: none"> • maintain a log of the attendance at the initial and ongoing training 	107	✓
3	Policy and procedures for security training and awareness		
	<ul style="list-style-type: none"> • A policy and procedures must be developed and implemented for initial security orientation as well as ongoing security training. 	107	✓

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	• set out the time frame within which agents must complete the initial security orientation	107	✓
	• require an agent to complete the initial security orientation prior to being given access to PHI	107	✓
	• identify the agent(s) responsible for preparing and delivering the security orientation and training	107	✓
	• set out the process that must be followed in notifying the agent(s) responsible for preparing and delivering the initial security orientation when an agent has commenced or will commence an employment, contractual or other relationship with CCO, including the agent(s) responsible for providing notification, the time frame within which notification must be provided, and the format of the notification	108	✓
	• the security orientation shall include:	108	
	• An overview of the security policies, procedures and practices that have been implemented by CCO	108	✓
	• The consequences of breach of the security policies, procedures and practices implemented;	108	✓
	• An explanation of the security program	108	✓
	• The safeguards implemented by CCO to protect PHI	108	✓
	• duties and responsibilities of agents implementing the safeguards	108	✓
	• duties and responsibilities imposed on agents in identifying security breaches	108	✓
	• the policy and procedure shall require:	108	
	• ongoing security training to be formalized and standardized	108	✓
	• role-based training	108	✓
	• address any new security policies, procedures and practices	108	✓

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	<ul style="list-style-type: none"> • must have regard to any recommendations with respect to security training made in PIAs, the investigation of information security breaches and the conduct of security audits including penetration testing, ethical hacks and reviews of system control and audit logs 	108	✓
	<ul style="list-style-type: none"> • a log be maintained to track attendance 	109	✓
	<ul style="list-style-type: none"> • The process to be followed in tracking attendance 	109	✓
	<ul style="list-style-type: none"> • documentation completed to verify attendance 	109	✓
	<ul style="list-style-type: none"> • the agent(s) responsible for completing the documentation 	109	✓
	<ul style="list-style-type: none"> • the agent to whom this documentation must be provided 	109	✓
	<ul style="list-style-type: none"> • the required content of the documentation 	109	✓
	<ul style="list-style-type: none"> • identify the procedure for those who do not attend training 	109	✓
	<ul style="list-style-type: none"> • address where documentation related to attendance will be retained 	109	✓
	<ul style="list-style-type: none"> • the policy and procedure shall: 	109	
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • discuss the other mechanisms implemented by CCO to raise awareness of the security program 	109	✓
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • discuss the frequency CCO communicates with its agents in relation to information security, 	109	✓
	<ul style="list-style-type: none"> • require agents to comply with the policy and its procedures and must address how and by whom compliance will be enforced 	109	✓
	<ul style="list-style-type: none"> • stipulate that compliance will be audited 	109	✓
	<ul style="list-style-type: none"> • to notify CCO if an agent believes there may have been a breach of this policy or its procedures. 	109	✓
	<ul style="list-style-type: none"> • implement a comprehensive security training policy that: 	2008 Recom	

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	<ul style="list-style-type: none"> Encompasses both initial security training for all new employees, staff, consultants 	2008 Recom	✓
	<ul style="list-style-type: none"> Encompasses ongoing security training 	2008 Recom	✓
	<ul style="list-style-type: none"> Emphasizes attendance for security training is mandatory 	2008 Recom	✓
	<ul style="list-style-type: none"> States when the initial security training will be provided, namely prior to being given access to PHI 	2008 Recom	✓
	<ul style="list-style-type: none"> States the frequency of ongoing training 	2008 Recom	✓
	<ul style="list-style-type: none"> Identifies the individuals that will be doing the initial and ongoing training 	2008 Recom	✓
	<ul style="list-style-type: none"> Describes the process that will be used to track attendance at both the initial and ongoing training sessions 	2008 Recom	✓
	<ul style="list-style-type: none"> sets out the responsible person for tracking attendance and the consequences for failing to attend 	2008 Recom	✓
	<ul style="list-style-type: none"> Amend the Security Acknowledgement Form: 	2008 Recom	✓
	<ul style="list-style-type: none"> require persons signing to comply with all the security policies and procedures implement by CCO and not simply those enumerated in the form 	2008 Recom	✓
	<ul style="list-style-type: none"> require that the CTO or Systems Security Specialist be notified in the event of a breach or suspected breach of the Security Acknowledgement Form 	2008 Recom	✓
	<ul style="list-style-type: none"> Recommendation on the on-going security training: 	2008 Recom	
	<ul style="list-style-type: none"> role-based in order to ensure that agents understand how to apply the security policies, procedures, and practices implemented in their day-to-day work 	2008 Recom	✓

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	<ul style="list-style-type: none"> Addresses any new security policies, procedures and practices implemented by CCO and significant amendments to existing security policies, procedures and practices. 	2008 Recom	✓
	<ul style="list-style-type: none"> To include content that considers any training related recommendations from security reviews, vulnerability assessments and threat and risk assessments 	2008 Recom	✓
4	Log of attendance at initial security orientation and ongoing security training		
	<ul style="list-style-type: none"> maintain a log of the attendance of agents at the initial and ongoing security training. 	110	✓
5	Policy and procedures for the execution of confidentiality agreements by agents		
	<ul style="list-style-type: none"> require agents to execute a Confidentiality Agreement at the commencement of their employment, contractual or other relationship with CCO, and before being given access to PHI. 	110	✓
	<ul style="list-style-type: none"> recommended that the policy and procedures require that a Confidentiality Agreement be executed by agents on an annual basis 	110	
	<ul style="list-style-type: none"> the policy and procedure must: 	110	
	<ul style="list-style-type: none"> identify the agents(s) responsible for ensuring that Confidentiality Agreement is executed with each agent of CCO at commencement of employment, contractual or other relationship. 	110	✓
	<ul style="list-style-type: none"> outline the process that must be followed in notifying the responsible agent(s) each time an agent starts an employment or contractual relationship with CCO 	110	✓
	<ul style="list-style-type: none"> outline the process that must be followed where an executed Confidentiality Agreement is not received within a defined period of time following the commencement of the employment, contractual or other relationship or following the date that the Confidentiality Agreement must be executed on an annual basis 	110	✓

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	<ul style="list-style-type: none"> outline the process that must be followed by the responsible agent(s) in tracking the execution of Confidentiality Agreements 	110	✓
	<ul style="list-style-type: none"> require that a log be maintained of executed Confidentiality Agreements 	110	✓
	<ul style="list-style-type: none"> comply with the policy and its procedures and address how compliance will be enforced and the consequences of breach. 	110	✓
	<ul style="list-style-type: none"> set out the frequency with which the policy and its procedures will be audited 	111	✓
	<ul style="list-style-type: none"> requirement to notify CCO if an agent believes there may have been a breach of this policy or its procedures. 	111	✓
	<ul style="list-style-type: none"> Amend the Confidentiality Policy or Privacy Training and Awareness Procedure: 		
	<ul style="list-style-type: none"> Make explicit that the Statement of Confidentiality must be executed upon the commencement of the relationship with CCO and prior to being given access to PHI 	2008 Recom	✓
	<ul style="list-style-type: none"> Set out the process that will be used to track execution of the Statement of Confidentiality including the person(s) responsible for tracking execution and the consequences for failing to execute the Statement of Confidentiality 	2008 Recom	✓
	<ul style="list-style-type: none"> Amend the Statement of Confidentiality to: 		

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	<ul style="list-style-type: none"> Require agents to immediately notify the Privacy Unit in the Event of a breach or suspected breach of the Statement of Confidentiality 	2008 Recom	✓
	<ul style="list-style-type: none"> Require employees who cease their work with CCO to set out the secure manner in which the PHI must be returned, or to state that the PHI must be destroyed 	2008 Recom	✓
	<ul style="list-style-type: none"> Require the agent to provide written and signed confirmation that the PHI as permanently destroyed in a secure manner 	2008 Recom	✓
6	Template confidentiality agreement with agents		
	<ul style="list-style-type: none"> The Confidentiality Agreement must: 		
	<ul style="list-style-type: none"> describe the status of CCO under the Act and outline the responsibilities arising from this status. 	111	✓
	<ul style="list-style-type: none"> state that individuals executing the agreement are agents of the CCO in respect of PHI and outline the responsibilities arising from this status. 	111	✓
	<ul style="list-style-type: none"> require agents to comply with the provisions of the Act and regulation, and with the terms of the agreement. 	111	✓
	<ul style="list-style-type: none"> have agents acknowledge they have read, understood and agree to comply with privacy and security policies 	111	✓
	<ul style="list-style-type: none"> provide a definition of personal health information consistent with the Act 	111	✓
	<ul style="list-style-type: none"> identify the purposes for which agents are permitted to collect, use and disclose PHI on behalf of CCO 	112	✓
	<ul style="list-style-type: none"> In identifying the purposes for which agents are permitted to collect, use or disclose PHI CCO must ensure that each collection, use or disclosure identified in the Confidentiality Agreement is permitted by the Act 	112	✓

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	<ul style="list-style-type: none"> the Confidentiality Agreement must prohibit agents from collecting and using PHI except as permitted in the Agreement and from disclosing such information except as permitted in the Agreement or as required by law 	112	✓
	<ul style="list-style-type: none"> prohibit agents from collecting, using or disclosing PHI if other information will serve the purpose 	112	✓
	<ul style="list-style-type: none"> require agents to securely return all property of CCO 	112	✓
	<ul style="list-style-type: none"> stipulate the time frame the property of CCO must be securely returned, the secure manner in which the property must be returned and to whom the property must be securely returned. 	112	✓
	<ul style="list-style-type: none"> notify CCO if the agent believes that there may have been a breach of the Confidentiality Agreement or CCO privacy or security policies and procedures 	112	✓
	<ul style="list-style-type: none"> outline the consequences of breach of the agreement and address how compliance will be enforced 	112	✓
	<ul style="list-style-type: none"> stipulate that compliance with the Confidentiality Agreement will be audited and set out the manner in which compliance will be audited. 	112	✓
7	Log of executed confidentiality agreements with agents		
	<ul style="list-style-type: none"> maintain a log of Confidentiality Agreements that have been executed by agents 	112-113	✓
8	Job descriptions for the position(s) delegated day-to-day authority to manage the privacy program		
	<ul style="list-style-type: none"> A job description for the positions that manage the privacy program on behalf of CCO must be developed 	113	✓
	<ul style="list-style-type: none"> The job description shall: 	113	

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	<ul style="list-style-type: none"> • set out the reporting relationship to the Chief Executive Officer or the Executive Director 	113	✓
	<ul style="list-style-type: none"> • identify the responsibilities and obligations of the position(s) in respect of the privacy program, which shall include: 	113	
	<ul style="list-style-type: none"> • Developing, implementing, reviewing and amending privacy policies, procedures and practices 	113	✓
	<ul style="list-style-type: none"> • Ensuring compliance with privacy policies, procedures and practices 	113	✓
	<ul style="list-style-type: none"> • Ensuring transparency of privacy policies, procedures and practices 	113	✓
	<ul style="list-style-type: none"> • Facilitating compliance with the <i>Act</i> and its regulation; 	113	✓
	<ul style="list-style-type: none"> • Ensuring agents are aware of the <i>Act</i> and its regulation 	113	✓
	<ul style="list-style-type: none"> • Ensuring agents are aware of the privacy policies, procedures 	113	✓
	<ul style="list-style-type: none"> • ensuring the delivery of the privacy training 	113	✓
	<ul style="list-style-type: none"> • Conducting, reviewing and approving PIAs 	113	✓
	<ul style="list-style-type: none"> • Responding to privacy complaints and inquiries 	113	✓

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	<ul style="list-style-type: none"> • Receiving, documenting, tracking, investigating and remediating privacy breaches or suspected privacy breaches 	114	✓
	<ul style="list-style-type: none"> • Conducting privacy audits 	114	✓
9	Job descriptions for the position(s) delegated day-to-day authority to manage the security program		
	<ul style="list-style-type: none"> • A job description for the position(s) that have been delegated day-to-day authority to manage the security program 	114	✓
	<ul style="list-style-type: none"> • the reporting relationship of the day-to-day authority to the Chief Executive Officer or the Executive Director 	114	✓
	<ul style="list-style-type: none"> • identify the responsibilities and obligations of the position(s) in respect of the security program, which shall include: 	114	✓
	<ul style="list-style-type: none"> • Developing, implementing, reviewing and amending security policies, procedures and practices. 	114	✓
	<ul style="list-style-type: none"> • Ensuring compliance with the security policies 	114	✓
	<ul style="list-style-type: none"> • Ensuring agents are aware of the security policies 	114	✓
	<ul style="list-style-type: none"> • delivery of the initial security orientation 	114	✓
	<ul style="list-style-type: none"> • the ongoing security training and fostering a culture of information security awareness 	114	✓
	<ul style="list-style-type: none"> • investigating and remediating information security breaches 	114	✓
	<ul style="list-style-type: none"> • Conducting security audits pursuant 	114	✓
10	Policy and procedures for termination or cessation of the employment or contractual relationship		

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	<ul style="list-style-type: none"> require agents, as well as their supervisors, to notify CCO of the termination of the employment, contractual or other relationship. 	114	✓
	<ul style="list-style-type: none"> identify the agent(s) to whom notification of the termination of the employment, contractual or other relationship must be provided, the nature and format of the notification, the time frame within which notification must be provided and the process that must be followed in providing notification 	114-115	✓
	<ul style="list-style-type: none"> require agents to securely return all property of CCO on or before the date of termination 	114	✓
	<ul style="list-style-type: none"> the policy and procedure shall : 	115	
	<ul style="list-style-type: none"> Define property 	115	✓
	<ul style="list-style-type: none"> identify the agent(s) to whom the property must be securely returned, the secure method by which the property must be returned and the time frame within which the property must be securely returned. 	115	✓
	<ul style="list-style-type: none"> the documentation that must be completed, provided and/or executed and the required content of the documentation. 	115	✓
	<ul style="list-style-type: none"> the agent(s) responsible for completing, providing and/or executing the documentation 	115	✓
	<ul style="list-style-type: none"> the procedures to be followed in the event that the property of CCO is not securely returned upon termination of the employment, contractual or other relationship, including the agent responsible for implementing the procedure and the time frame following termination within which the procedure must be implemented 	115	✓
	<ul style="list-style-type: none"> that access to locations where records of PHI are retained be immediately terminated and the agents responsible for terminating access 	115	✓
	<ul style="list-style-type: none"> the procedure to be followed in terminating access 	115	✓

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	<ul style="list-style-type: none"> the time frame within which access must be terminated 	115	✓
	<ul style="list-style-type: none"> the documentation that must be completed 	115	✓
	<ul style="list-style-type: none"> require agents to comply with the policy and its procedures and address how compliance will be enforced 	115	✓
	<ul style="list-style-type: none"> Stipulate that compliance will be audited and set out the frequency with the policy and procedures will be audited and the agent responsible for conducting the audit and for ensuring compliance with the policy and its procedures. 	115	✓
	<ul style="list-style-type: none"> require agents to notify CCO if an agent believes there may have been a breach of this policy or its procedures. 	115	✓
11	Policy and procedures for discipline and corrective action		
	<ul style="list-style-type: none"> develop and implement a policy and associated procedures for discipline and corrective action in respect of PHI 	116	✓
	<ul style="list-style-type: none"> address the investigation of disciplinary matters including: 	116	
	<ul style="list-style-type: none"> person(s) responsible for conducting the investigation 	116	✓
	<ul style="list-style-type: none"> procedure that must be followed in the investigation 	116	✓
	<ul style="list-style-type: none"> documentation that must be completed in the investigation process, the required content of the documentation and the agent(s) responsible for completing, providing, and/or executing the documentation 	116	✓
	<ul style="list-style-type: none"> to whom the results of the investigation must be reported 	116	✓
	<ul style="list-style-type: none"> The types of discipline that may be imposed by CCO 	116	✓
	<ul style="list-style-type: none"> the factors considered determining the appropriate discipline 	116	✓

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	<ul style="list-style-type: none"> agent(s) responsible for determining the appropriate discipline 	116	✓
	<ul style="list-style-type: none"> the procedure to be followed in making this determination and the agent(s) that must be consulted in making this determination 	116	✓
	<ul style="list-style-type: none"> identify the documentation that must be completed in relation to discipline imposed 	116	✓
	<ul style="list-style-type: none"> retention of documentation related to the discipline and corrective action taken 	116	✓