

October 31, 2016

Mr. Brian Beamish
Information and Privacy Commissioner of Ontario
2 Bloor Street East, Suite 1400
Toronto ON M4W 1A8

Dear Mr. Beamish,

The Pediatric Oncology Group of Ontario (POGO) is pleased to submit its report for the review period 2014-2017, in compliance with the *Manual for the Review and Approval of Prescribed Persons and Prescribed Entities*, issued by your office on April 19, 2010.

We have also included Dr. Corin Greenberg's signed and notarized affidavit.


We would like to thank Ms Judith Goldstein, Legal Counsel, and Ms. Nicole Minutti Health Privacy Policy Analyst from your office for their assistance in clarifying questions pertaining to the manual. A special thank you is given to POGO Senior Management, the POGO Information Technology Team, and to Ms. Dina Skvirsky (our Administrative Assistant) for all their assistance in writing, editing, reviewing and preparing this report.

In compliance with recommendations made by the IPC after your last review period in 2013/14, POGO has: developed and implemented a fulsome Business Continuity Plan; updated its privacy and security audit documentation and processes; augmented its privacy impact assessments to ensure all information required by the Manual has been included; and ensured that the privacy and security audit indicators also reflect the requirements outlined in the manual.

As discussed and agreed to at the time of the last review, we will post Parts 1 to 4 of the Report and the Sworn Affidavit. Given the sensitivity of the information contained in Appendix 1: Privacy, Security and Other Indicators, POGO will not post this appendix on its website. POGO feels that the information contained in this document could potentially adversely impact our information security safeguards, if published. We would respectfully request that when we are ready to make our Privacy Report public, we will provide a version of Appendix 1 that is suitable for posting on the IPC website.

We remain confident that POGO's status will be renewed and look forward to your response.

Best regards,



Bruna DiMonte, RN, BScN
Senior Database Administrator &
Co-Privacy Officer



Madeline Riehl, MHS
Senior Associate Research and Planning &
Co-Privacy Officer

cc.

Dr. Corin Greenberg, Executive Director, Pediatric Oncology Group of Ontario
Judith Goldstein, Legal Counsel, IPC, Ontario

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Ms. F. Wu
Managing Director
NFQ Ventures

Appendix 2: Affidavit of Chief Executive Officer

I, Dr. Corin Greenberg, of Toronto, in the Province of Ontario, MAKE OATH AND SAY:

1. I am the Chief Executive Officer of the Pediatric Oncology Group of Ontario (POGO).
2. The Pediatric Oncology Group of Ontario's Chief Executive Officer has formally delegated the supervision and management of day-to-day operations of the privacy portfolio to Bruna DiMonte (RN, BScN): Senior Database Administrator & Co-Privacy Officer, and to Madeline Riehl (MHSc): Senior Associate Research and Planning & Co-Privacy Officer, and has also formally delegated the supervision and management of day-to-day operations of the Information Technology (IT) security portfolio to Sibel Yardimoglu (BSc, Database Administrator/Analyst and Programmer) and Oleg Chayat (BEng, System/Network Analyst).
3. The Pediatric Oncology Group of Ontario has in place privacy and security policies, procedures, protocols, practices, standards, tools, guidelines and other instruments ("Privacy and Security Program") to protect the privacy of the individuals whose personal health information it receives and to maintain the confidentiality of that information.
4. The Pediatric Oncology Group of Ontario has submitted a written report (the "Report") to the Information and Privacy Commissioner of Ontario in compliance with the *Manual for the Review and Approval of Prescribed Persons and Prescribed Entities*, as issued by the Information and Privacy Commissioner of Ontario on April 19, 2010.
5. I have made due inquiries of Bruna DiMonte (RN, BScN), Senior Database Administrator & Co-Privacy Officer, and of Madeline Riehl (MHSc) Senior Associate Research and Planning & Co-Privacy Officer regarding the contents of the Privacy and Security Policies implemented by the Pediatric Oncology Group of Ontario, as relates to the *Manual for the Review and Approval of Prescribed Persons and Prescribed Entities* and the Report.

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6. Based on my knowledge, having exercised reasonable diligence, the Report describes the Privacy and Security Program implemented by the Pediatric Oncology Group of Ontario, in an accurate and complete manner as of the date on which the Report was submitted.

7. Based on my knowledge, having exercised reasonable diligence, the Pediatric Oncology Group of Ontario, has taken ~~or will take~~ ^{making} steps that are reasonable in the circumstances to: (i) ensure the Privacy and Security Program implemented comply with the Manual as set out in the Report; (ii) ensure compliance with the Privacy and Security Program implemented; and (iii) protect personal health information against theft, loss, unauthorized use, disclosure, unauthorized copying, modification, or disposal.

SWORN (OR AFFIRMED) BEFORE ME)
)
at the City/Town/Etc. of Toronto, in the)
)
County/Regional Municipality/Etc. of)
)
York, in the Province of Ontario,)
)
on [Date] October 26th, 2016)

Michele D. Guy

Commissioner for Taking Affidavits
MICHELE D. GUY
NOTARY PUBLIC

Corin Greenberg

Signature of Dr. Corin Greenberg

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