



CTN's Role as a Health Information Network Provider (HINP)

Ontario's Personal Health Information Protection Act (PHIPA 2004) contains requirements that apply to a specific type of electronic service provider, referred to as a Health Information Network Provider (HINP). PHIPA defines "Health Information Network Provider" or "Provider" as a person or organization which provides services to two or more Health Information Custodians (HIC's) primarily to enable the custodians to use electronic means to disclose personal health information to one another, whether or not the person or organization is an agent or works on behalf of any of the custodians. O. Reg. 329/04, s. 6 (2).

As a Health Information Network Provider (HINP) CTN regularly assesses the threats, risks and impacts associated with the shared electronic client record and works to safeguard the personal health information within the shared record and meet its obligations related to privacy and security.

In its capacity as a Health Information Network Provider CTN meets the following requirements:

- Manage the various roles and responsibilities as they pertain to PHIPA (HIC, HINP, and Agent) and establish appropriate agreements.
- Manage the identification and management of privacy and security incidences as they pertain to the use of the shared record across the participating network partners including notification of any breach or security risk.
- Maintain a Privacy Officer for addressing any and all privacy issues, concerns, and/or complaints, including defining and communicating the complaint process.
- Implement retention and disposal policies specific to client information.
- Provide information about CTN's HINP role with respect to privacy practices and the safeguards in place to both the public and the participating organizations including Health Information Custodians and non-Health Information Custodians.
- Implement logging, auditing, and monitoring controls and communicate these controls to all authorized users.
- Provide custodians with information related to the access and transfer of personal health information.
- Work with third party software vendors to ensure compliance with necessary conditions and restrictions.
- Perform a system Privacy Impact Assessment ("PIA") and Threat/Risk Assessment ("TRA") of services provided to identify improvements and mitigate risks.

For more information about CTN's privacy and security practices please contact CTN's Privacy Officer at privacy@ctnsy.ca

For information about Ontario's Personal Health Information and Protection Act please contact the Information and Privacy Commissioner at www.ipc.on.ca