

IPC 2011 Triennial Review - Requested Organizational and Other Documentation			
Req.	Minimum Content of Required Documentation	Page Ref# in Manual	Req't Met
1	Privacy governance and accountability framework		
	• compliance with the Act and with the privacy policies, procedures and practices implemented CCO	117	✓
	• the Chief Executive Officer or the Executive Director is accountable for CCO's compliance with the Act	117	✓
	• the Chief Executive Officer or the Executive Director is accountable for ensuring that CCO and its agents comply with the privacy policies, procedures and practices implemented	117	✓
	• day-to-day authority to manage the privacy program	117	✓
	• nature of the reporting relationship to the Chief Executive Officer or the Executive Director must be described	117	✓
	• the responsibilities of the delegated day-to-day authority	117	✓
	• The role of the Board of Directors in respect of the privacy program	117	✓
	• whether the privacy program is overseen by a committee of the Board of Directors, the frequency with which and the method and manner by which the Board of Directors is updated with respect to the privacy program, the agent(s) responsible for providing such update and the matters with respect to which the Board of Directors is required to be updated	117	✓
	• updates on the initiatives undertaken by the privacy program provided to the Board of Directors	117	✓

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	<ul style="list-style-type: none"> updates to the Board of Directors must include privacy training; the development and implementation of privacy policies, procedures, and practices; a discussion of the privacy audits and PIAs conducted, including the results of and recommendations arising from the privacy audits and PIAs and the status of implementation of the recommendations; and any privacy breaches and privacy complaints that were investigated, including the results of and any recommendations arising from these investigations and the status of implementation of the recommendations. 	117	✓
	<ul style="list-style-type: none"> the privacy governance and accountability framework be accompanied by a privacy governance organizational chart. 	117	✓
	<ul style="list-style-type: none"> the manner in which the privacy governance and accountability framework will be communicated 	118	✓
2	Security governance and accountability framework		
	<ul style="list-style-type: none"> compliance with the Act and with the security policies, procedures and practices implemented by CCO 	118	✓
	<ul style="list-style-type: none"> the Chief Executive Officer or the Executive Director is accountable for ensuring the security of PHI 	118	✓
	<ul style="list-style-type: none"> the Chief Executive Officer or the Executive Director is accountable for ensuring that CCO and its agents comply with the security policies, procedures and practices implemented 	118	✓
	<ul style="list-style-type: none"> day-to-day authority to manage the security program 	118	✓
	<ul style="list-style-type: none"> the nature of the reporting relationship to the CEO or the Executive Director 	118	✓
	<ul style="list-style-type: none"> the responsibilities of the delegated day-to-day authority 	118	✓
	<ul style="list-style-type: none"> The role of the Board of Directors in respect of the security program 	118	✓

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	<ul style="list-style-type: none"> whether the security program is overseen by a committee of the Board of Directors, the frequency with which and the method and manner by which the Board of Directors is updated with respect to the security program, the agent(s) responsible for providing such update and the matters with respect to which the Board of Directors is required to be updated 	118	✓
	<ul style="list-style-type: none"> updates on the initiatives undertaken by the security program provided to the Board of Directors 	118	✓
	<ul style="list-style-type: none"> updates to the Board of Directors must include security training; the development and implementation of security policies, procedures, and practices; a discussion of the security audits, including the results of and recommendations arising from the security audits and the status of implementing of the recommendations; and any information security breaches investigated, including the results of and any recommendations arising from these investigations and the status of implementation of the recommendations 	118	✓
	<ul style="list-style-type: none"> the security governance and accountability framework be accompanied by a security governance organizational chart 	119	✓
	<ul style="list-style-type: none"> the manner in which the security governance and accountability framework will be communicated 	119	✓
3	Terms of reference for committees with roles with respect to the privacy program and/or security program		
	<ul style="list-style-type: none"> terms of reference for each committee that has a role in respect of the privacy and/or the security program 	119	✓
	<ul style="list-style-type: none"> the terms of reference: <ul style="list-style-type: none"> the membership of the committee 	119	✓
	<ul style="list-style-type: none"> the chair of the committee 	119	✓
	<ul style="list-style-type: none"> the mandate and responsibilities of the committee in respect of the privacy and/or the security 	119	✓
	<ul style="list-style-type: none"> the frequency with which the committee meets 	119	✓

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	<ul style="list-style-type: none"> to whom the committee reports 	119	✓
	<ul style="list-style-type: none"> the types of reports produced by the committee 	119	✓
	<ul style="list-style-type: none"> the format of the reports 	119	✓
	<ul style="list-style-type: none"> to whom these reports are presented 	119	✓
	<ul style="list-style-type: none"> the frequency of these reports 	119	✓
4	Corporate risk management framework		
	<ul style="list-style-type: none"> a comprehensive and integrated corporate risk management framework 	119	Not Met
	<ul style="list-style-type: none"> identify, assess, mitigate and monitor risks, including risks that may negatively affect the ability of CCO to protect PHI 	119	Not Met
	<ul style="list-style-type: none"> must address the agent (s) responsible and the process that must be followed in identifying risks that negatively affect the ability of CCO to protect PHI. 	119	Not Met
	<ul style="list-style-type: none"> This shall include person/organization that must be consulted in identifying the risk; documentation that must be completed, agents responsible for completing the documentation, the agent (s) to whom this documentation must be provided; and the required content of the documentation 	119	Not Met
	<ul style="list-style-type: none"> Address the agent (s) responsible and the process followed and criteria considered in ranking the risks and assessing likelihood and the potential impact. This shall include; 	119	Not Met
	<ul style="list-style-type: none"> the agent (s)/organizations consulted in assessing and ranking the risks and assessing likelihood and the potential impact, the documentation that must be completed for assessing, ranking and rationale, agent (s) responsible for completing the documentation, to whom the documentation must be provided and the content of the documentation 	119	Not Met
	<ul style="list-style-type: none"> Identify agent (s) responsible, the process that must be followed and the criteria considered in identifying strategies to mitigate the actual or potential risks to privacy, the process for implementing mitigation strategies and the agent/organization consulted in identifying and implementing the mitigation strategies 	120	Not Met

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	<ul style="list-style-type: none"> documentation that must be completed, provided and/or executed in identifying, implementing, monitoring and implementation of the mitigation strategies, the agent responsible for documentation, to whom the documentation will be provided and the required content of the documentation 	120	Not Met
	<ul style="list-style-type: none"> Address the manner and format in which the results of the corporate risk management process are communicated and reported. 	120	Not Met
	<ul style="list-style-type: none"> This involves identifying agent (s) responsible for communication, the nature and format of communication, and to whom the results will be communicated. 	120	Not Met
	<ul style="list-style-type: none"> The process for approval and endorsement of the results including agent(s) responsible for approval and endorsement be outlined 	120	Not Met
	<ul style="list-style-type: none"> a corporate risk register be maintained and that the corporate risk register be reviewed on an ongoing basis 	120	Not Met
	<ul style="list-style-type: none"> the frequency with which the corporate risk register must be reviewed and the process that must be followed in reviewing and amending the risk register 	120	Not Met
	<ul style="list-style-type: none"> integration of risk management into the policies, procedures and practices of CCO and the agent responsible for integration 	120	Not Met
5	Corporate risk register		
	<ul style="list-style-type: none"> develop and maintain a corporate risk register identifying risks that may negatively affect the ability of CCO to protect PHI 	121	✓
	<ul style="list-style-type: none"> The risk register: 	121	✓
	<ul style="list-style-type: none"> include an assessment of the risk 	121	✓
	<ul style="list-style-type: none"> a ranking of the risk 	121	✓
	<ul style="list-style-type: none"> the mitigation strategy to reduce the likelihood of the risk occurring 	121	✓
	<ul style="list-style-type: none"> the date that the mitigation strategy was implemented 	121	✓
	<ul style="list-style-type: none"> the agent(s) responsible for implementation of the mitigation strategy 	121	✓
6	Policy and procedures for maintaining a consolidated log of recommendations		

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	<ul style="list-style-type: none"> • a consolidated and centralized log to be maintained of all recommendations arising from PIAs, privacy audits, security audits and the investigation of privacy complaints and privacy and security breaches. 	121	✓
	<ul style="list-style-type: none"> • the consolidated log must include recommendations made by the IPC that must be addressed by CCO prior to the next review of its practices and procedures 	121	✓
	<ul style="list-style-type: none"> • The policy and procedures: 	121	✓
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • the frequency with which and the circumstances in which the consolidated and centralized log must be reviewed 	121	✓
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • the agent(s) responsible for reviewing and amending the log 	121	✓
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • the process that must be followed in this regard 	121	✓
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • log be updated each time a recommendation has been addressed 	121	✓
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • log be reviewed on an ongoing basis 	121	✓
	<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. 	121	✓
	<ul style="list-style-type: none"> • compliance will be audited 	121	✓
	<ul style="list-style-type: none"> • notify CCO if an agent believes there may have been a breach of this policy or its procedures. 	121	✓
7	Consolidated log of recommendations		
	<ul style="list-style-type: none"> • maintain a consolidated and centralized log of all recommendations 	122	✓
	<ul style="list-style-type: none"> • the name and date of the document, investigation, audit and/or review from which the recommendation arose. 	122	✓
	<ul style="list-style-type: none"> • each recommendation: 	122	
	<ul style="list-style-type: none"> <ul style="list-style-type: none"> • the recommendation made 	122	✓

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	<ul style="list-style-type: none"> the manner in which the recommendation was addressed 	122	✓
	<ul style="list-style-type: none"> the date that the recommendation was addressed 	122	✓
	<ul style="list-style-type: none"> the agent(s) responsible for addressing the recommendation 	122	✓
8	Business continuity and disaster recovery plan		
	<ul style="list-style-type: none"> protect and ensure the availability of the information technology of CCO in the event of business interruptions including natural disasters 	122	✓
	<ul style="list-style-type: none"> The plan: <ul style="list-style-type: none"> notification of the interruption or threat 	122	
	<ul style="list-style-type: none"> documentation of the interruption or threat 	122	✓
	<ul style="list-style-type: none"> assessment of the severity of the interruption or threat 	122	✓
	<ul style="list-style-type: none"> activation of the business continuity 	122	✓
	<ul style="list-style-type: none"> disaster recovery plan 	122	✓
	<ul style="list-style-type: none"> recovery of PHI 	122	✓
	<ul style="list-style-type: none"> the persons or organizations that must be notified of business interruptions 	122	✓
	<ul style="list-style-type: none"> the time frame within which notification must be provided 	122	✓
	<ul style="list-style-type: none"> the manner and format of notification 	122	✓
	<ul style="list-style-type: none"> the nature of the information that must be provided upon notification 	122	✓
	<ul style="list-style-type: none"> documentation that must be completed 	122	✓
	<ul style="list-style-type: none"> a contact list of all agents that must be notified of business interruptions 	122	✓
	<ul style="list-style-type: none"> identify the agent(s) responsible for assessing the severity level 	122	✓
	<ul style="list-style-type: none"> the criteria pursuant to which this assessment is to be made 	122	✓

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	<ul style="list-style-type: none"> the agents that must be consulted in assessing the severity level 	122	✓
	<ul style="list-style-type: none"> the documentation that must be completed 	123	✓
	<ul style="list-style-type: none"> the required content of the documentation 	123	✓
	<ul style="list-style-type: none"> the agent(s) to whom the documentation must be provided 	123	✓
	<ul style="list-style-type: none"> to whom the results of this assessment must be reported. 	123	✓
	<ul style="list-style-type: none"> agent(s) and process when conducting an initial impact assessment of the interruption this includes its impact on the technical and physical infrastructure and business processes of CCO; the agents and other persons or organizations that are required to be consulted in undertaking the assessment; the requirements that must be satisfied and the criteria that must be utilized in conducting the assessment; the documentation that must be completed, provided and/or executed; the agent(s) to whom the documentation must be provided; and the agent(s) to whom the results of the initial impact assessment must be communicated. 	123	✓
	<ul style="list-style-type: none"> agent(s) responsible for conducting a damage assessment 	123	✓
	<ul style="list-style-type: none"> the damage assessment: 	123	
	<ul style="list-style-type: none"> how the assessment will be conducted 	123	✓
	<ul style="list-style-type: none"> persons required to be consulted during the assessment 	123	✓
	<ul style="list-style-type: none"> requirements and the criteria when undertaking the assessment 	123	✓
	<ul style="list-style-type: none"> documentation that must be completed 	123	✓
	<ul style="list-style-type: none"> agent(s) to whom the documentation must be provided 	123	✓
	<ul style="list-style-type: none"> agent(s) to whom the results must be communicated. 	123	✓
	<ul style="list-style-type: none"> the plan: 	123	

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	<ul style="list-style-type: none"> • identify the agent(s) responsible for resumption and recovery 	123	✓
	<ul style="list-style-type: none"> • the procedure that must be utilized in resumption and recovery 	123	✓
	<ul style="list-style-type: none"> • the prioritization of resumption and recovery activities 	123	✓
	<ul style="list-style-type: none"> • the criteria for the prioritization of resumption and recovery activities is determined 	123	✓
	<ul style="list-style-type: none"> • the recovery time objectives for critical applications 	123	✓
	<ul style="list-style-type: none"> • inventory of all critical applications 	123	✓
	<ul style="list-style-type: none"> • the agent(s) responsible for the inventory 	124	✓
	<ul style="list-style-type: none"> • the agent(s) consulted in developing the inventory 	124	✓
	<ul style="list-style-type: none"> • determination of critical applications and business functions 	124	✓
	<ul style="list-style-type: none"> • actions taken during business interruptions and threats to the operating capabilities of CCO 	124	✓
	<ul style="list-style-type: none"> • testing, maintenance and assessment of the business continuity and disaster recovery plan this includes identifying the frequency of testing, the agent(s) responsible for amending the Plan as a result of the testing; the procedure to be followed testing, maintaining, assessing and amending the Plan; and the agent(s) responsible for approving the Plan and any amendment thereto 	124	✓
	<ul style="list-style-type: none"> • the procedure to be followed in communicating the business continuity and disaster recovery plan 	124	✓