



Information and Privacy
Commissioner/Ontario
Commissaire à l'information
et à la protection de la vie privée/Ontario

October 31, 2011

VIA ELECTRONIC AND REGULAR MAIL

Corin Greenberg, Ph.D., Executive Director
Pediatric Oncology Group of Ontario
480 University Avenue, Suite 1014
Toronto, Ontario
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Dear Dr. Greenberg:

RE: Review of the Report on the Practice and Procedures of the Pediatric Oncology Group of Ontario

Pursuant to subsection 45(4) of the *Personal Health Information Protection Act, 2004* (“the Act”), my office is responsible for reviewing the practices and procedures implemented by each prescribed entity to protect the privacy of individuals whose personal health information it receives, and to protect the confidentiality of that information, every three years.

Given the practices and procedures of the Pediatric Oncology Group of Ontario (POGO), a prescribed entity within the meaning of the *Act*, were last approved on October 31, 2008, my office was again required to review these practices and procedures and advise whether they continue to meet the requirements of the *Act* on or before October 31, 2011.

In accordance with the new process as set out in the *Manual for the Review and Approval of Prescribed Persons and Prescribed Entities* (“the *Manual*”), POGO, as a prescribed entity which was seeking the continued approval of its practices and procedures, submitted a detailed written report and sworn affidavit to my office. These documents were to conform to the requirements set out in the *Manual*.

My office has now completed its review of your report and affidavit. Based on this review, I am satisfied that POGO continues to have in place practices and procedures that sufficiently protect the privacy of individuals whose personal health information it receives, that sufficiently maintain the confidentiality of that information and that continue to meet the requirements of the *Act*.

Accordingly, effective October 31, 2011, I am pleased to advise that the practices and procedures of POGO continue to be approved for a further three-year period.

Attached is an Appendix containing recommendations to further enhance the practices and procedures of POGO, which must be implemented prior to the next legislated review.

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I would like to extend my gratitude to you and your staff for the cooperation provided during the course of the review, including the diligence and timeliness in submitting the requested documentation, in responding to requests by my office for further information and in making the amendments requested.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Ann Cavoukian', written in a cursive style.

Ann Cavoukian, Ph.D.
Commissioner

Attach.

cc: Madeline Riehl, Co-Privacy Officer
Bruna Di Monte, Co-Privacy Officer

Appendix

1. It is recommended that POGO complete, by November 30, 2011, the implementation of the two security control recommendations that remain outstanding from the threat and risk assessment completed in June 2008 i.e. the implementation of all documented firewall controls; and the implementation of the documented VPN rules and report to the IPC upon completion thereof.
2. It is recommended that POGO develop and implement a policy that sets out the types of security audits that are required to be conducted, in accordance with the requirements of the *Manual*.
3. It is recommended that POGO develop and implement a comprehensive and integrated corporate risk management framework in accordance with the requirements of the *Manual*.
4. It is recommended that POGO develop and maintain a corporate risk register in accordance with the requirements of the *Manual*.
5. It is recommended that POGO develop and implement a business continuity and disaster recovery plan in accordance with the requirements of the *Manual*.