

ONE Network[®]

Privacy Impact Assessment Summary

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Introduction

eHealth Ontario completed a Privacy Impact Assessment (PIA) on eHealth Ontario's ONE Network in September 2012, in accordance with *Personal Health Information Protection Act (PHIPA)*, 2004 and eHealth Ontario's Personal Health Information Privacy Policy.

ONE Network can take on different types of roles depending on the way a project/program is making use of the service. ONE Network can play one of the following three roles as defined under PHIPA e.g. as an electronic service provider (ESP), as health information network provider (HINP) and for activities under PHIPA O. Reg 329 section 6.2.

The following is a summary of the PIA, including a brief background on ONE Network, key findings, and eHealth Ontario's progress in implementing the identified recommendations.

Background

ONE Network is a secure, dedicated, private and scalable network that enables eligible health care providers and organizations to securely share information at high-speed data transfer rates. There are two different types of ONE Network products; ONE Network Enterprise and ONE Network Access. The type of network provided to clients depends on each client's requirements.

1. ONE Network Enterprise:

This is a secure, dedicated, and private network that is scalable to meet the future growth of the health care sector in Ontario. Clients benefit from quality of service, around the clock monitoring as well as incident, change and problem management. eHealth Ontario procures ONE Network Enterprise through Hydro One Telecom Inc. (HOT).

The ONE Network Enterprise is composed of two major components¹:

1. The core network, which is constructed of dedicated equipment and optical light paths to create a high-speed network that spans the province.
2. The access network, which uses dedicated equipment and fiber that connect clients' sites to the core network securely and provides protection against interception or data modification. When dedicated equipment is not used, internet protocol security (IPSec) tunnels protect the data over shared networks.

2. ONE Network Access

This network service is for smaller organizations such as Continuing Care facilities, physicians and Ontario Telemedicine Network (OTN) sites that require high reliability and quality of service. Clients benefit from firewall management, quality of service, around the clock monitoring, incident, change and problem management to effectively maintain the network. eHealth Ontario leverages commercial networks to deliver the ONE Network Access service and uses IPSec tunnels to protect the data. This provides protection against interception or modification of the data.

Currently there is one type of ONE Network Access in operation:

¹ <http://www.ehealthontario.on.ca/en/services/one-network>

1. ONE Network Access - Office Net²

eHealth Ontario previously offered another option – extended wide area network (eWAN) connections – to clients. eWAN clients are now being migrated over to Office Net.

Summary of Privacy Impact Assessment

The scope of the ONE Network PIA includes all components of the ONE Network as well as policies and procedures associated with its implementation. The PIA analyzes the legislative authority under which eHealth Ontario provides ONE Network services and considers the technical, administrative and physical safeguards which have been put in place to ensure that all data flows occur in a secure and privacy-protective manner, and are in compliance with legislative requirements, relevant agreements, and best practices as represented in the Canadian Standards Association Privacy Code and eHealth Ontario's privacy policies, procedures and privacy best practices.

The PIA concludes that eHealth Ontario has the overall mandate for providing ONE Network service to its clients. The ONE Network service permits eHealth Ontario clients to promote the delivery of health care services in Ontario. Additionally, eHealth Ontario has a robust infrastructure for the processing of sensitive personal health information, with policies and practices to protect the privacy of Ontarians and the security of the information in its custody.

Summary of the Implementation Plan for the Privacy Impact Assessment Recommendations

The PIA provides two recommendations: One relates to the lack of a plain language description for the ONE Network service; the other to a lack of updated vendor agreement policies. eHealth Ontario is currently in the process of implementing each recommendation.

Glossary

ESP	Electronic service provider
eWAN	Extended wide area network
HINP	Health information network provider
HOT	Hydro One Telecom Inc.
O.Reg.	Ontario regulation
PHIPA	Personal Health Information Protection Act, 2004
PIA	Privacy impact assessment
OTN	Ontario Telemedicine Network
IPSec	Internet protocol security

² <http://www.ehealthontario.on.ca/en/services/one-network>

Contact Information

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