

# ONE<sup>®</sup> Mail Direct

## Privacy Impact Assessment Summary

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## Introduction

eHealth Ontario has completed a Privacy Impact Assessment (PIA) on eHealth Ontario's ONE Mail Direct service. The PIA was completed on July 8, 2013, in accordance with Personal Health Information Protection Act (PHIPA) and eHealth Ontario's Personal Health Information Privacy Policy.

ONE Mail Direct is governed by PHIPA, Development Corporations Act (DCA), and Freedom of Information Protection of Privacy Act (FIPPA). eHealth Ontario acts as a Health Information Network Provider (HINP) when providing ONE Mail Direct services. ONE Mail Direct is required to comply with requirements for a HINP as noted within PHIPA.

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

## Background

ONE Mail Direct is an email service developed by eHealth Ontario for the secure transmission of personal information (PI) and/or personal health information (PHI) between participating health care professionals. ONE Mail Direct allows health care providers and organizations to share information more reliably, quickly and securely – helping them improve care by enabling them to spend more time with patients.

ONE Mail Direct permits users to access email via four different routes. All access methods involve connecting to ONE Mail Direct servers which reside in eHealth Ontario state-of-the-art data centres.

- Simple Mail Transfer Protocol Internet Message Access Protocol ;
- Remote Procedure Call over Hyper Text Transfer Protocol Secured ;
- Outlook Web Access; and
- HTTPs through Outlook Web Access.

ONE Mail Direct includes anti-virus and anti-spam protection. An anti-virus service consists of a software program designed to identify and remove a known or potential computer virus. An anti-spam service consists of a software routine that deletes incoming spam or diverts it to a 'junk' mailbox. Spam filters are built into a user's email program and updated on a regular basis as they are published by the vendor. Spam filtering can be configured to trap messages, based on a variety of criteria, including sender's email address, specific words in the subject or message body, or by the type of attachment that accompanies the message.

## Summary of Privacy Impact Assessment

The PIA determined that eHealth Ontario is acting as a HINP when providing ONE Mail Direct Services. ONE Mail Direct is governed by PHIPA, DCA, and FIPPA. eHealth Ontario complies with PHIPA, DCA and FIPPA requirements.

The PIA recommends several measures to ensure that the data received and utilized by eHealth Ontario, for the purposes of the ONE Mail Direct complies with PHIPA as well as eHealth Ontario policies, procedures and privacy best practices.

# Summary of the Implementation Plan for the Privacy Impact Assessment Recommendations

The PIA provides a number of recommendations to mitigate risks identified in the PIA. These risks can broadly be classified as enhancements to ONE Mail Direct policy, procedures, and guidelines.

Below is a summary of the recommendations:

- Amend the ONE Mail Direct service module to include eHealth Ontario's obligations in the event of a privacy incident/breach.
- Update the plain language description to include references to ONE Mail Direct mobile service.
- Update the ONE Mail policy to include roles and responsibilities for clients when accessing ONE Mail on a mobile device. In addition, guidelines on the secure use of mobile devices must be provided to clients.
- Update appropriate schedules in the ONE Mail Direct module to:
  - Include a description of ONE Mail Direct mobile service.
  - Update the plain language description to include information on ONE Mail Direct mobile service.
- Create and provide guidelines on the secure use of ONE Mail Direct mobile to users. Guidelines should be posted on the ONE Mail Direct web page.

eHealth Ontario is currently in the process of implementing each of the recommendations identified in the ONE Mail Direct PIA.

# Glossary

<b>HIC</b>	<b>Health Information Custodian</b>
<b>DCA</b>	Development Corporations Act
<b>FIPPA</b>	Freedom of Information Protection of Privacy Act
<b>HCP</b>	Health Care Provider
<b>HINP</b>	Health Information Network Provider
<b>IMAP4</b>	Internet Message Access Protocol
<b>LRA</b>	Local Registration Agent
<b>OWA</b>	Outlook Web Access
<b>PHI</b>	Personal Health Information
<b>PHIPA</b>	Personal Health Information Protection Act, 2004
<b>PI</b>	Personal Information
<b>PIA</b>	Privacy Impact Assessment
<b>RPC/HTTPs</b>	Remote Procedure Call over Hyper Text Transfer Protocol Secured
<b>SMTP</b>	Simple Mail Transfer Protocol

# Contact Information

Please contact the eHealth Ontario privacy office should you have any questions about the ONE Mail Direct PIA Summary:

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