

Personal Information Bank

The Ottawa Hospital (TOH) is required by the *Freedom of Information and Protection of Privacy Act* (FIPPA) to produce an index of Personal Information Banks (PIB) – a description of the collections of personal information (recorded information about an identifiable individual) maintained to support the Hospital's programs and activities, where such collections are organized and retrievable by an individual's name or another identifier.

The Personal Information Bank includes the following:

- The title and type of the class of records
- The statute authorizing the collection of personal information
- The location of this class of records
- The format of this class of records
- A description of the type of information that is maintained in this class of records
- The uses and users of the personal information maintained in this class of records
- A description of the types of individuals whose information is maintained in this class of records
- The retention and disposal (how long the information is kept)

Where the retention and disposal section indicates "TBD", TOH is in the process of developing retention and disposal policies for the class of records or personal information bank.

Table of Contents

Academic	4
Staff Learning	4
Administration	5
Consents for Photography/Video and Supporting Documentation.....	5
Freedom of Information & Protection of Privacy	6
Personal Health Information Access Requests	7
Personal Health Information Correction Requests	8
Waivers	9
Facilities Planning and Support Services	10
Parking Records.....	10
OHSC Emergency Contact List.....	11
Finance	12
Accounts Payable	12
Billing & Remittance	13
Human Resources.....	14
Employee Records	14
Medical Staff Files.....	15
Volunteers.....	16
Insurance	17
Automobile Insurance	17
Occupational Health and Wellness	18
Accident/Incident Investigation Reports	18
Employee Medical Data (Disability Management Services)	19
Infection Prevention and Control.....	20
Radiation Exposure Records	21
Staff Immunization Data	22
Wellness (and Events)	23
Patient Relations.....	24

Patient Relations Records.....	24
Quality and Patient Safety	25
Patient Critical Incident Reviews	25
Patient Incident Reports	26
Incident Reports – New Campus Development.....	27
Patient Quality/Risk Audits	28
Quality and Patient Safety Reviews	29
Security	30
Protective Services Records.....	30

Academic

Staff Learning

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records relating to staff learning opportunities including Oracle Electronic Learning Module (“ ELM ”) and external education events
Location	ELM, third-party software
Format	Electronic
Information Held / Maintained	Name, learning activity and history, education history, funding amounts, attendance
Uses	Track compliance of mandatory e-learning
Users	Education staff, Digital Education staff, managers, learning instructors
Type of Individual in Bank	Staff, medical staff, residents, fellows, students, volunteers, and external staff
Retention and Disposal Policy	External Elm users: 6 months Internal ELM users and third-party software: varies by software, minimum 7 years

Administration

Consents for Photography/Video and Supporting Documentation

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records related to the photographing, audio recording, or videotaping of staff, patients, visitors, or members of the public
Location	Communications
Format	Electronic, Paper
Information Held / Maintained	Name, consent
Uses	Creation of educational resources and hospital/media stories
Users	Communications staff
Type of Individual in Bank	Individuals who agree to take part in photography, audio, or video recordings by TOH
Retention and Disposal Policy	2 years

Freedom of Information & Protection of Privacy

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records relating to requests for access under the <i>Freedom of Information and Protection of Privacy Act</i>
Location	Information and Privacy Office
Format	Electronic, Paper
Information Held / Maintained	Name, contact information, request
Uses	Administration of freedom of information requests
Users	Information and Privacy Office, Information and Privacy Commissioner of Ontario
Type of Individual in Bank	Individuals who make records requests
Retention and Disposal Policy	Minimum of 1 year after last use

Personal Health Information Access Requests

Type	PIB
Legal Authority	<i>Personal Health Information Protection Act, 2004, S.O. 2004, c. 3, Sched. A</i>
Description	Records related to requests for access to personal health information
Location	Health Records
Format	Electronic
Information Held / Maintained	Name, contact information, date of birth, MRN, health insurance information, request details (including consents and substitute decision-maker information), personal financial details (if applicable)
Uses	Administration of requests for personal health information
Users	Release of Information staff, Information and Privacy Commissioner of Ontario
Type of Individual in Bank	Individuals who request personal health information
Retention and Disposal Policy	Permanent

Personal Health Information Correction Requests

Type	PIB
Legal Authority	<i>Personal Health Information Protection Act, 2004, S.O. 2004, c. 3, Sched. A</i>
Description	Records related to requests for corrections to personal health information
Location	Health Records
Format	Electronic
Information Held / Maintained	Name, contact information, date of birth, MRN, health insurance information, request details (including consents and substitute decision-maker information), personal financial details (if applicable)
Uses	Administration of correction requests for personal health information
Users	Release of Information staff, Information and Privacy Commissioner of Ontario
Type of Individual in Bank	Individuals who request personal health information
Retention and Disposal Policy	Permanent

Waivers

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records related to staff and visitor event waivers
Location	Various: Engagement & Recognition, Planning & Development, Radiation & Laser Safety, etc.
Format	Electronic, Paper
Information Held / Maintained	Name, consent
Uses	Document consents and waivers for participating in events at or provided by TOH
Users	Event organizers
Type of Individual in Bank	Individuals who participate in events at or provided by TOH
Retention and Disposal Policy	2 years

Facilities Planning

Parking Records

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records related to the management of parking facilities owned or leased by TOH
Location	Third-party software
Format	Electronic
Information Held / Maintained	Name, vehicle identification information, encrypted credit card and other payment information
Uses	Access and revenue control
Users	Parking Services staff, Finance staff
Type of Individual in Bank	Individuals who park at TOH
Retention and Disposal Policy	TBD

OHSC Emergency Contact List

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records related to contact information for members of The Ottawa Health Sciences Centre (OHSC) site located at TOH's General Campus. OHSC members include TOH, The University of Ottawa, and The Children's Hospital of Eastern Ontario
Location	Technical Advisory Committee SharePoint
Format	Electronic
Information Held / Maintained	Name, title, organization, phone number
Uses	Emergency contact list or escalation tool when facilities-related emergency situations occur that impact OHSC members and operations
Users	Designated Facilities staff of OHSC members
Type of Individual in Bank	OHSC members' staff, including third-party consultants and contractors, who have a role in the oversight and maintenance of the site and its shared assets
Retention and Disposal Policy	3 years after the employee's departure

Finance

Accounts Payable

Type	PIB
Legal Authority	<i>Public Hospitals Act, R.S.O. 1990, c. P.40</i>
Description	Records relating to payments made by TOH
Location	Finance, third-party software
Format	Electronic
Information Held / Maintained	Name, address, invoices, expense claim statements, financial transactions, staff ID number
Uses	Support hospital expense transactions
Users	Finance staff
Type of Individual in Bank	Employees, individuals providing goods and services to the Hospital
Retention and Disposal Policy	7 years following the year for which they are kept

Billing & Remittance

Type	PIB
Legal Authority	<i>Public Hospitals Act</i> , R.S.O. 1990, c. P.40
Description	Billing and remittance documentation including patient, institutional, and other governmental agencies, and the Ministry of Health (“ MOH ”)
Location	Epic, third-party software
Format	Electronic
Information Held / Maintained	Name, contact information, date of birth, sex, gender, MRN, Health Card number, third-party insurance information, guarantor information, services provided (including diagnosis)
Uses	Support hospital revenue transactions and issue billings and collections
Users	Finance staff, MOH, external institutions (including insurance institutions), government agency, guarantors, collection agencies
Type of Individual in Bank	Patients and guarantors
Retention and Disposal Policy	Life of the patient record

Human Resources

Employee Records

Type	PIB
Legal Authority	<i>Employment Standards Act</i> , S.O. 2000, c. 41, <i>Insurance Act</i> , R.S.O. 1990, c.1.8; <i>Canada Pension Plan</i> , R.S. 1985, C. C-8
Description	Records relating to employees of TOH, including records relating to payroll and benefit plans that provide full or partial financial coverage offered to eligible staff and their families
Location	Human Resources, third-party software
Format	Electronic, Paper
Information Held / Maintained	Employee ID, name, address, contact information, date of birth, sex, SIN, marital status, education, certifications, work eligibility, attendance leaves of absence information, benefits/pension enrolment, grievance information, discipline records, performance reviews, tax exemptions, banking information
Uses	Document work history, calculate and administer payroll, and administration of benefits/pension plans
Users	Human Resources staff, Finance staff, insurance providers
Type of Individual in Bank	Staff, medical staff, and eligible family members
Retention and Disposal Policy	Physical files: 6 years after the employee's departure Electronic files: Indefinite Disciplinary sanctions: per collective agreement requirements

Medical Staff Files

Type	PIB
Legal Authority	<i>Public Hospitals Act</i> , R.S.O. 1990 c. P. 40
Description	Records relating to the appointment of physicians practicing at TOH
Location	Medical Affairs
Format	Paper, Electronic
Information Held / Maintained	Name, address/phone, email, date of birth, license and malpractice insurance, training, references, vulnerable sector check, immunizations, privileges, performance reviews
Uses	Support credentialing process for new applicants and the renewal of privileges on an annual basis
Users	Credentials Committee, Senior Medical Officer, Chief of Staff, Medical Affairs staff, Chief Executive Officer, Department/Division Heads
Type of Individual in Bank	Physicians, dental surgeons, midwives
Retention and Disposal Policy	2 years if rejected End of last appointment year plus 6 years if appointed

Volunteers

Type	PIB
Legal Authority	<i>Public Hospitals Act</i> , R.S.O 1990 c. P.40
Description	Records relating to volunteers at TOH
Location	Volunteer Resources, third-party software
Format	Electronic, Paper
Information Held / Maintained	Name, address, email, immunization status, police record check, references, emergency contact, performance management documentation
Uses	Contacting and scheduling volunteers, onboarding compliance
Users	Volunteer Resources staff
Type of Individual in Bank	Volunteers at TOH
Retention and Disposal Policy	6 years after date of departure

Insurance

Automobile Insurance

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records of employee information for insurance purposes
Location	Office of the EVP and CFO
Format	Electronic
Information Held / Maintained	Driver's license, insurance provider, driver's abstract, letter of experience
Uses	For employee coverage under the Hospital's automobile insurance policy
Users	Office of the EVP and CFO staff
Type of Individual in Bank	Employees covered by Hospital automobile insurance
Retention and Disposal Policy	Expired policies: 5 years Closed claims: 7 years

Occupational Health and Wellness

Accident/Incident Investigation Reports

Type	PIB
Legal Authority	<i>Occupational Health and Safety Act, R.S.O. 1990, c. O.1, Workplace Safety and Insurance Act, 1997, S.O. 1997, c. 16, Sched. A</i>
Description	Records relating to workplace incidents and injuries
Location	Safety Office, third-party software
Format	Electronic
Information Held / Maintained	Employee ID, name, address, contact information, details related to incidents, medical information if applicable
Uses	Identify, investigate, and respond to health and safety incidents and injuries
Users	Safety Office staff, Occupational Health staff, Joint Health & Safety Committee, WSIB, Ministry of Labour, individual's manager and other departments as applicable and appropriate
Type of Individual in Bank	Staff who have been involved in an incident or accident
Retention and Disposal Policy	Creation year plus minimum 6 years

Employee Medical Data (Disability Management Services)

Type	PIB
Legal Authority	<i>Occupational Health and Safety Act</i> , R.S.O. 1990, c. O.1; <i>Workplace Safety and Insurance Act</i> , 1997, S.O. 1997, c. 16, Sched. A
Description	Records relating to Initial Health Assessment requirements and other employee medical data, including medical leave, WSIB claims management, and absence management
Location	Occupational Health Services, third-party software
Format	Paper, Electronic
Information Held / Maintained	Name, address/phone, email, date of birth, immunizations, physician notes, nursing notes, correspondence
Uses	Assist with employee medical issues as they relate to employment
Users	Occupational Health Disability Management team and Health Services team
Type of Individual in Bank	Staff and medical staff
Retention and Disposal Policy	Current year plus minimum 6 years

Infection Prevention and Control

Type	PIB
Legal Authority	<i>Public Hospitals Act</i> , R.S.O. 1990, c. P.40; <i>Health Protection and Promotion Act</i> , R.S.O. 1990, c. H.7
Description	Records related to infection prevention and control at TOH
Location	Infection Prevention and Control
Format	Electronic, Paper
Information Held / Maintained	Patient name, MRN, other patient demographic information as required based on outbreak type
Uses	Report and track infection outbreaks as required by law
Users	Infection Prevention and Control staff
Type of Individual in Bank	Patients diagnosed with a reportable disease in an outbreak
Retention and Disposal Policy	TBD

Radiation Exposure Records

Type	PIB
Legal Authority	<i>Nuclear Safety and Control Act</i> , S.C. 1997, c. 9, <i>Occupational Health and Safety Act</i> , R.S.O. 1990, c. O.1
Description	Records relating to radiation exposure and dosimetry services
Location	Third-party software
Format	Electronic
Information Held / Maintained	Name, date and place of birth, SIN
Uses	Record and monitor radiation exposure in staff
Users	Radiation & Laser Safety staff, Health Canada
Type of Individual in Bank	Nuclear energy workers and X-ray workers
Retention and Disposal Policy	Lifetime of facility

Staff Immunization Data

Type	PIB
Legal Authority	<i>Occupational Health and Safety Act</i> , R.S.O. 1990, c. O.1; <i>Workplace Safety and Insurance Act</i> , 1997, S.O. 1997, c. 16, Sched. A; Canadian Immunization Guide for Healthcare Workers
Description	Records relating to staff immunization
Location	Occupational Health Services, third-party software
Format	Electronic, Paper
Information Held / Maintained	Name, date, vaccination, dose
Uses	Ensure staff safety related to outbreaks and exposure management
Users	Occupational Health Services staff
Type of Individual in Bank	Staff, medical staff, volunteers, residents
Retention and Disposal Policy	Current year plus minimum 6 years

Wellness (and Events)

Type	PIB
Legal Authority	<i>Freedom of Information and Protection of Privacy Act</i> , R.S.O. 1990, c. F.31
Description	Records relating wellness surveys and engagement of staff and medical staff
Location	Human Resources, third-party software
Format	Electronic
Information Held / Maintained	De-identified survey data
Uses	Support action planning and organizational changes to improve the engagement and wellbeing of staff and medical staff
Users	Wellness and Engagement team, Operational Leaders
Type of Individual in Bank	Staff, medical staff
Retention and Disposal Policy	10 years

Patient Relations

Patient Relations Records

Type	PIB
Legal Authority	<i>Excellent Care for All Act, 2010</i> , S.O. 2010, c. 14; O. Reg. 188/15: Patient Relations Process
Description	Records relating to patient complaints, feedback, and compliments, including clinical risk management
Location	Patient Relations, third-party software
Format	Electronic, Paper
Information Held / Maintained	Name and contact information of individual sharing their concern or complaint, and the personal health information involved in the matter
Uses	Manage, respond, and resolve expressed concerns, compliments, and claims
Users	Patient Relations office, affected TOH staff, insurer and insurance adjusters, and legal defense team
Type of Individual in Bank	Complainants and plaintiffs (patients, families & representatives)
Retention and Disposal Policy	Age of majority + 15 years

Quality and Patient Safety

Patient Critical Incident Reviews

Type	PIB
Legal Authority	<i>Personal Health Information Protection Act, 2004, S.O. 2004, c. 3 Sched. A; Quality of Care Information Protection Act, 2004, S.O. 2004, c. 3, Sched B; Excellent Care for All Act, 2010, S.O. 2010, c. 14</i>
Description	Records relating to critical incident reviews conducted for TOH
Location	Quality Department, third-party software
Format	Electronic, Paper
Information Held / Maintained	Clinical information related to care
Uses	Review of critical incidents for quality improvement, quality assurance and risk management
Users	Quality Department: Review Team, Executive Sponsors, Legal and Risk Management
Type of Individual in Bank	Patients, family members, staff, medical staff, and contracted service providers involved in the event(s) or review(s).
Retention and Disposal Policy	Year of record plus minimum 3 years

Patient Incident Reports

Type	PIB
Legal Authority	<i>Personal Health Information Protection Act, 2004, S.O. 2004, c. 3 Sched. A; Quality of Care Information Protection Act, 2004, S.O. 2004, c. 3, Sched B; Excellent Care for All Act, 2010, S.O. 2010, c. 14</i>
Description	Records related to actual or potential patient safety or clinical risk incidents
Location	Quality Department, third-party software
Format	Electronic, Paper
Information Held / Maintained	Names, details related to actual or potential incidents, clinical and medical information
Uses	Respond to potential and actual safety concerns and clinical risk management and issues
Users	Quality Department: Review Team, Executive Sponsors, Legal and Risk Management
Type of Individual in Bank	Patients, family members, staff, medical staff, and contracted service providers involved in an actual or potential safety or clinical risk management incident
Retention and Disposal Policy	Year of record plus minimum 3 years

Incident Reports – New Campus Development

Type	PIB
Legal Authority	<i>Occupational Health and Safety Act</i> , R.S.O. 1990, c. 0.2
Description	Records related to workplace incidents and accidents in relation to the New Campus Development
Location	Planning & Development SharePoint
Format	Electronic
Information Held / Maintained	Name, date of birth, incident details, years in the field, supervisor contact, WCB classification and case number
Uses	Respond to and report health and safety concerns and issues
Users	Planning & Development staff, New Campus Development project team, affected TOH staff, PSPC, insurer and insurance adjusters, and legal defense team
Type of Individual in Bank	Non-TOH individuals who have been involved in an incident or accident in relation to the New Campus Development
Retention and Disposal Policy	Creation year plus minimum 6 years

Patient Quality/Risk Audits

Type	PIB
Legal Authority	<i>Personal Health Information Protection Act, 2004, S.O. 2004, c. 3 Sched. A; Quality of Care Information Protection Act, 2004, S.O. 2004, c. 3, Sched B; Excellent Care for All Act, 2010, S.O. 2010, c. 14</i>
Description	Records related to patient quality and risk audits
Location	Quality Department, third-party software
Format	Electronic, Paper
Information Held / Maintained	Patient information, MRN, unit, responsible clinicians
Uses	Performance reporting for quality assurance and or quality improvement
Users	Quality Department staff, Analytics staff
Type of Individual in Bank	Patients, family members, staff, medical staff, and contracted service providers
Retention and Disposal Policy	Year of record plus minimum 3 years

Quality and Patient Safety Reviews

Type	PIB
Legal Authority	<i>Personal Health Information Protection Act, 2004, S.O. 2004, c. 3 Sched. A; Quality of Care Information Protection Act, 2004, S.O. 2004, c. 3, Sched B; Excellent Care for All Act, 2010, S.O. 2010, c. 14</i>
Description	Records relating to actual or potential patient safety or clinical risk incident reviews
Location	Quality Department, RLDatix (SLS)
Format	Electronic, Paper
Information Held / Maintained	Name and contact information of involved individuals, details of incident and surrounding circumstances
Uses	Performance reporting for quality assurance and/or quality improvement; Review of incidents for quality improvement, quality assurance and risk management
Users	Quality Department: Review Team, Executive Sponsors, Legal and Risk Management
Type of Individual in Bank	Patients, family members, staff, medical staff, and contracted service providers
Retention and Disposal Policy	Year of record plus minimum 3 years

Security

Protective Services Records

Type	PIB
Legal Authority	<i>Public Hospitals Act</i> , R.S.O. 1990, c. P.40
Description	Records relating to providing security for patients, visitors, staff, physicians and volunteers at TOH
Location	Protective Services, third-party software
Format	Electronic, Paper
Information Held / Maintained	Name, contact information, date of birth, photograph, incident information, images captured by video surveillance, trespass notices, violence flags, infectious diseases, criminal history
Uses	Document security incidents within the Hospital to assist investigations
Users	Protective Services staff, Patient Relations staff, police
Type of Individual in Bank	Staff, patients, visitors, volunteers
Retention and Disposal Policy	Video surveillance: varies by camera Security reports: Current year plus 2 years or until conclusion of any ongoing matter