MNP Information Security Classification Project Overview

Data Privacy

Security Day Slides

June 1, 2016

Project Purpose

- To develop a framework for classifying data that will be foundational for enhancing and streamlining data sharing and handling across the ministry and with health sector partners

- To build models/tools to be refined through short, proof of concept implementations and further engagement

- To support the goal of enabling and improving upon the current data sharing environment

Project Elements

1 Identify data assets against services

2 Establish organisational responsibilities for services

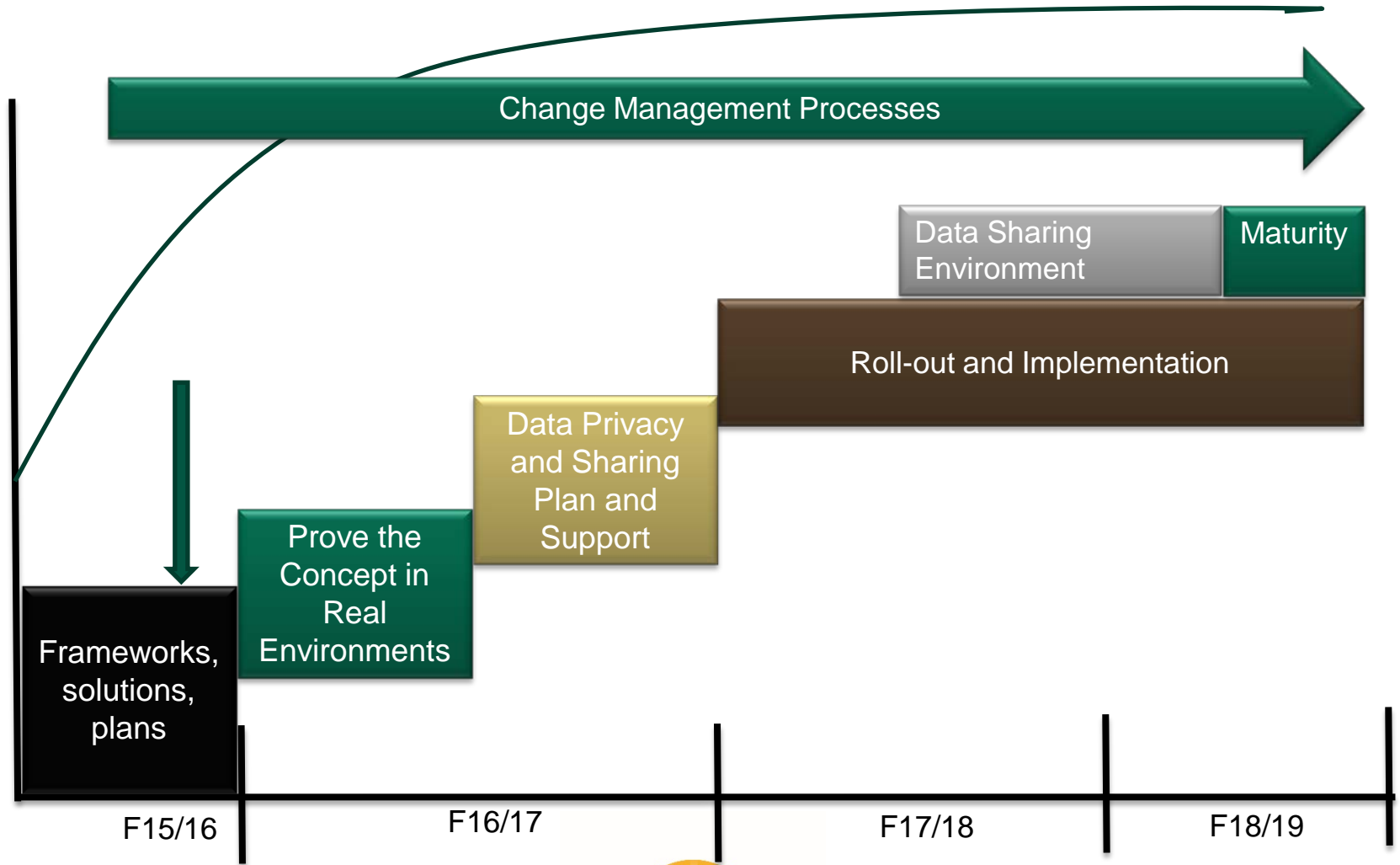**3** Develop classification framework for data classes

4 Develop handling rules for sharing data

5 Develop risk assessment tools

6 Develop implementation plan

BC Health Care Data Sharing

Handling Processes

Level	Procedure Level	STORAGE Read Only	STORAGE Encryption	STORAGE Within Secure Zone	TRANSMISSION Encryption	TRANSMISSION Only Within Secure Zone	IN USE Encryption	IN USE Within Secure Zone	DISPOSAL Normal Delete	DISPOSAL Secure Delete	DISPOSAL Delete Backup
PUBLIC		✓							✓		
INTERNAL				✓	✓				✓		
PROPRIETARY				✓	✓			✓		✓	
SENSITIVE				✓	✓		✓		✓		
HIGHLY SENSITIVE			✓	✓	✓	✓	✓	✓		✓	
RESTRICTED			✓	✓	✓	✓	✓	✓		✓	✓

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Risk Assessment

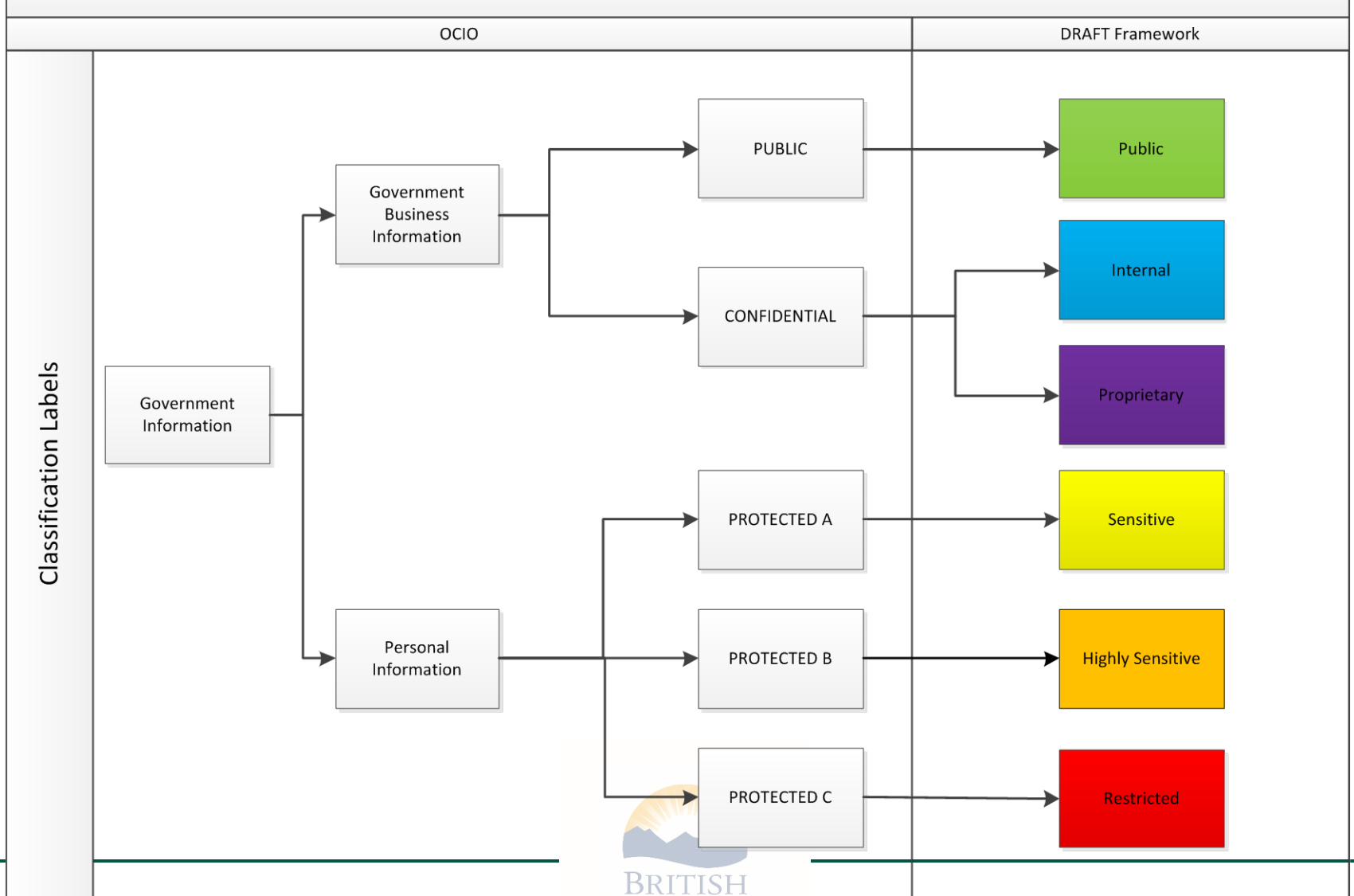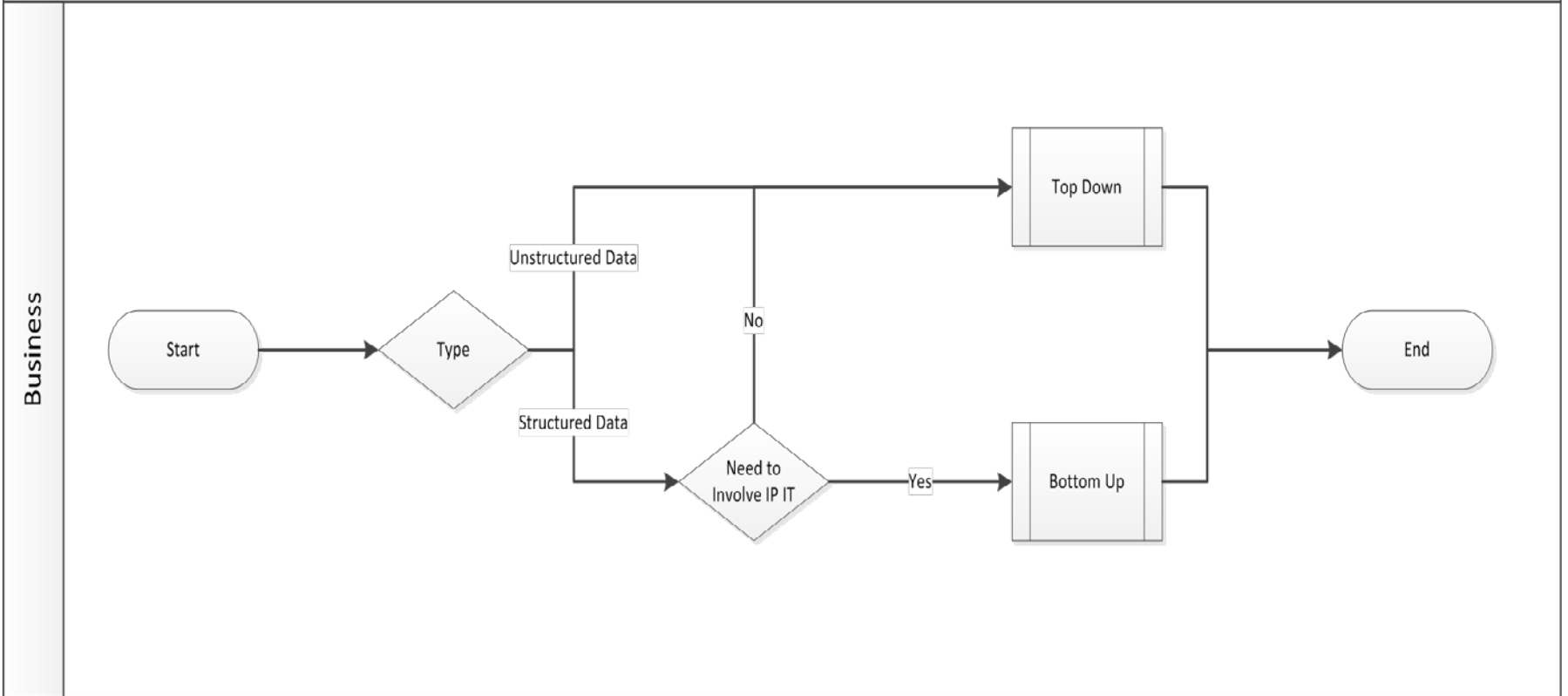|		LEVEL OF HARM				
		5	4	3	2	1
NATURE OF HARM	APPROPRIATE MEASURE	Extreme serious Harm	Very serious harm	Serious harm	Minor Harm	No significant harm
FINANCIAL LOSS (loss of revenue, unforeseen costs, legal liabilities, fraud)	Total financial impact	$10 + million	$1-10 million	$100 thousand - $1 million	$5-100 thousand	$0-5 thousand
DEGRADED PERFORMANCE (failure to achieve targets, loss of productivity)	Key targets under-achieved by	10%+	5% to 10%	1% - 5%	Less than 1%	No impact
	Number of staff-hours wasted	10,000	1,000 to 10,000	500 to 1000	100 to 500	0 to 100
LOSS OF MANAGEMENT CONTROL (impaired oversight of government operations)	Key metrics delayed	1 month+	1 to 4 weeks	Few days	Few hours	Little delay
	Key metrics inaccurate	All data unreliable	Much incorrect data	Some incorrect data	Little incorrect data	No incorrect data
DAMAGED REPUTATION (negative publicity, regulatory disapproval, litigation)	Drop in approval ratings	10% drop	5% to 10%	1% to 5%	Less than 1%	No impact
	Extent of negative publicity	Extremely negative	Majorly negative	Moderately negative	Minor negative	No publicity
	Political action taken	Prolonged discussion in the House	Short discussions in the House	Escalated to Deputy Minister	Escalated to Assistant Deputy Minister	No political impact
	Extent of litigation	Prolonged court case	Brief court case	Settlement during trial	Settlement before trial	No impact
IMPAIRED GROWTH (delayed new government initiatives)	Aborted initiatives or deadlines missed	Major initiative failed	Major initiative delayed by months	Major initiative delayed by weeks	Major initiated delayed by days	No impact
IMPACT ON SAFETY	Impact on health and safety	Loss of life	Very serious injury	Serious injury	Minor Injury	No impact

Where are we now?

Ministry of Health Classification

Data and Information	Categorization	Classification Process	Classes

"Data" means any health information and health-related information, including Business Information, Personal Information and non-personally identifiable information

Business Information – is all recorded information, regardless of format, that is received, created, deposited or held by the BC Ministry of Health in conducting daily operations on behalf of the citizens' of BC that does not contain personal information.

Processes are Needed - to classify data consistently and efficiently across multiple organizations. Continuous improvement will occur through pilots and continuous use.

Governance

Influence

Classification Process

Ministry of Health Information

Business Information

Public
Public information that causes no damage to the ministry or provincial interest nor a level of harm to a person, identifiable group or business entity.

Internal
Internal Information that is available to authorized MOH employees and contractors for shared use; release or disclosure of this information will not cause serious harm to MOH or it's employees and contractors.

Proprietary
Proprietary Information will be categorized as such based on its value to decision makers or to the outcome of the decision(s) being made. Release or disclosure of this information will cause harm or injury to the ministry or provincial interest, the employees or agents reputation and potentially give unfair advantage to an entity by its access

Personal Information

Classification Process

Influence

Service Delivery

Personal identity information - any information of a type that is commonly used, alone or in combination with other information, to identify or purport to identify an individual or group of individuals

Personal information - any information about an identifiable individual or group of individuals other than contact information

Process Influence – Governance needs will influence Business Classification whereas Service Delivery needs should influence the Personal Classification processes

Sensitive
Sensitive information collected in confidence related to the provision of health services and inappropriate access would result in little to no harm. Examples include:

- payments, eligibility, a health system identifier, data related to health service provisioning, test results, association with health provider professionals

Highly Sensitive
Highly Sensitive information collected that should be generally hidden from others due to its sensitivity and inappropriate access would result in significant harm. Examples include:

- mental health, addictions, sexually transmitted diseases, genetic disorders/diseases, abortion, reproductive counselling and outcomes, psychotherapy, gender re-assignment, criminal history, a community of interest (such as First Nation), or relates to employees, doctors, or VIPS

Restricted
Restricted information collected that needs to be highly restricted and inappropriate access would result in grave harm. Examples include:

- Social Insurance Number, abortion, coroner's autopsy, HIV results related to needle stick injuries, pre-employment test results

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Classification Mapping

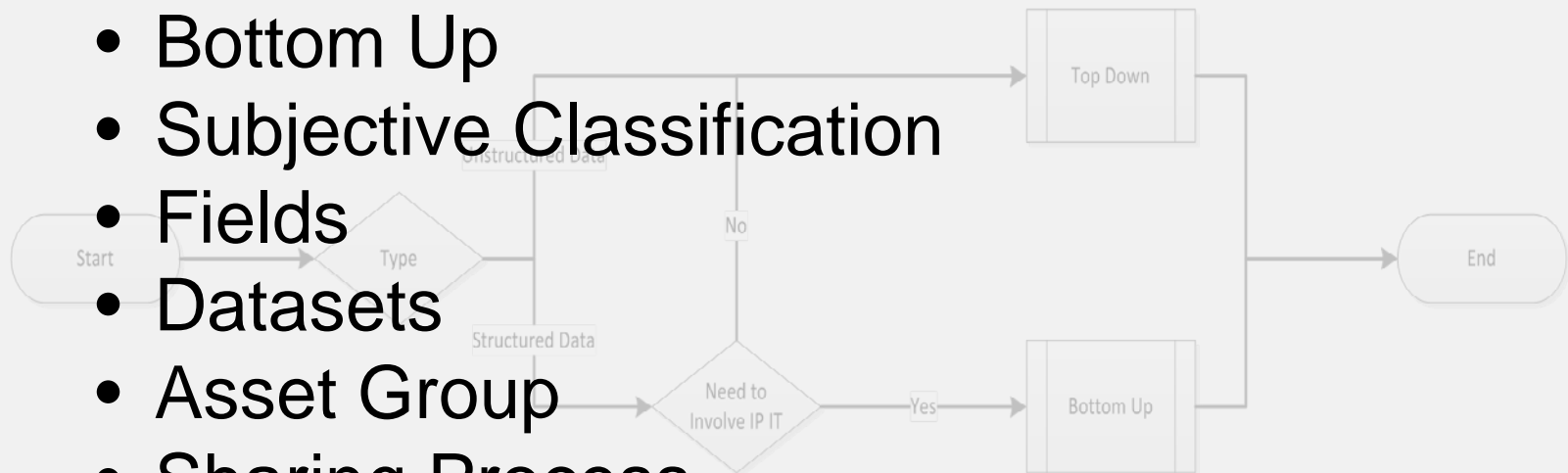# Classification Process

Classification Process
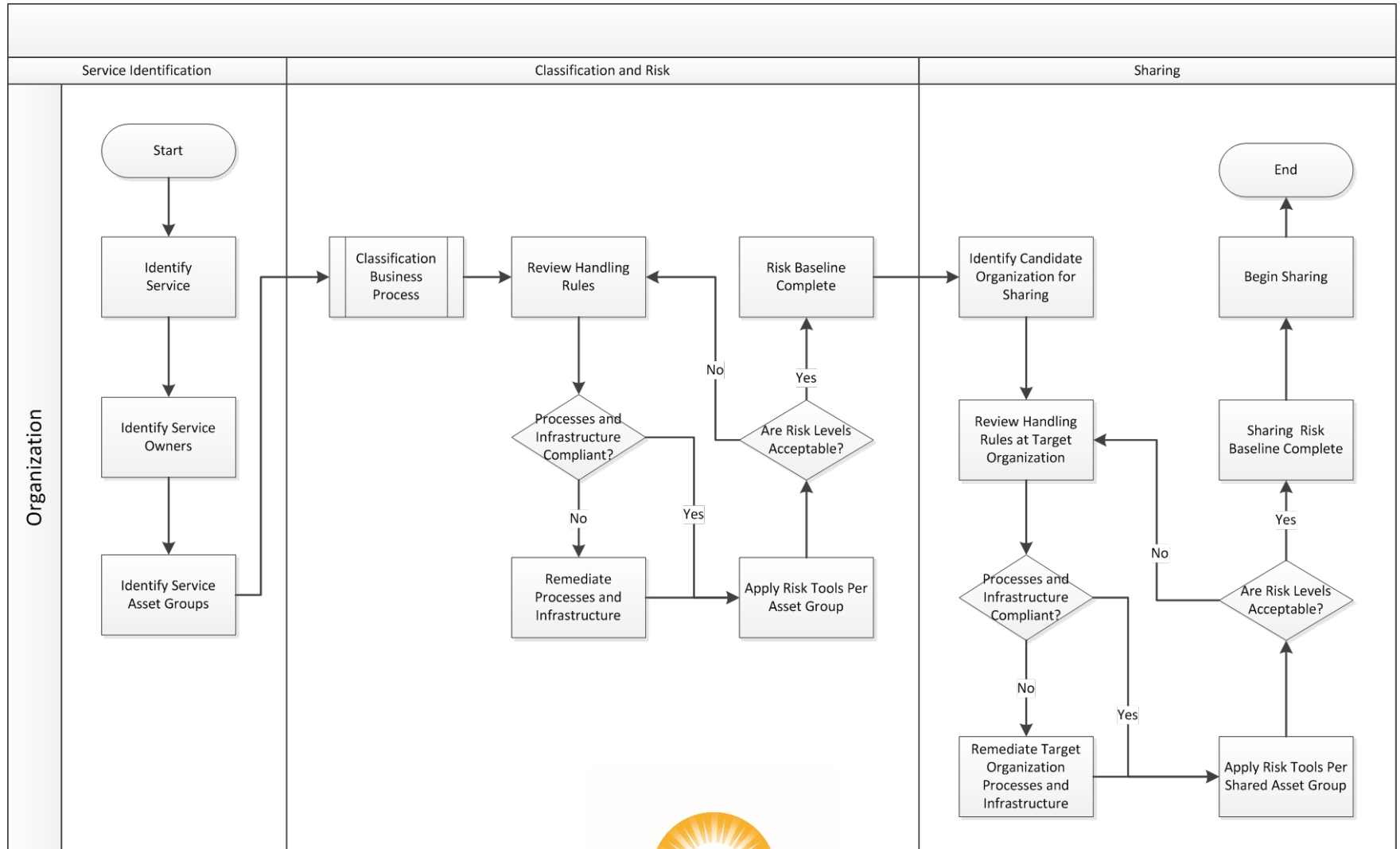
Classification Process

Business

- Top Down
- Bottom Up
- Subjective Classification
- Fields
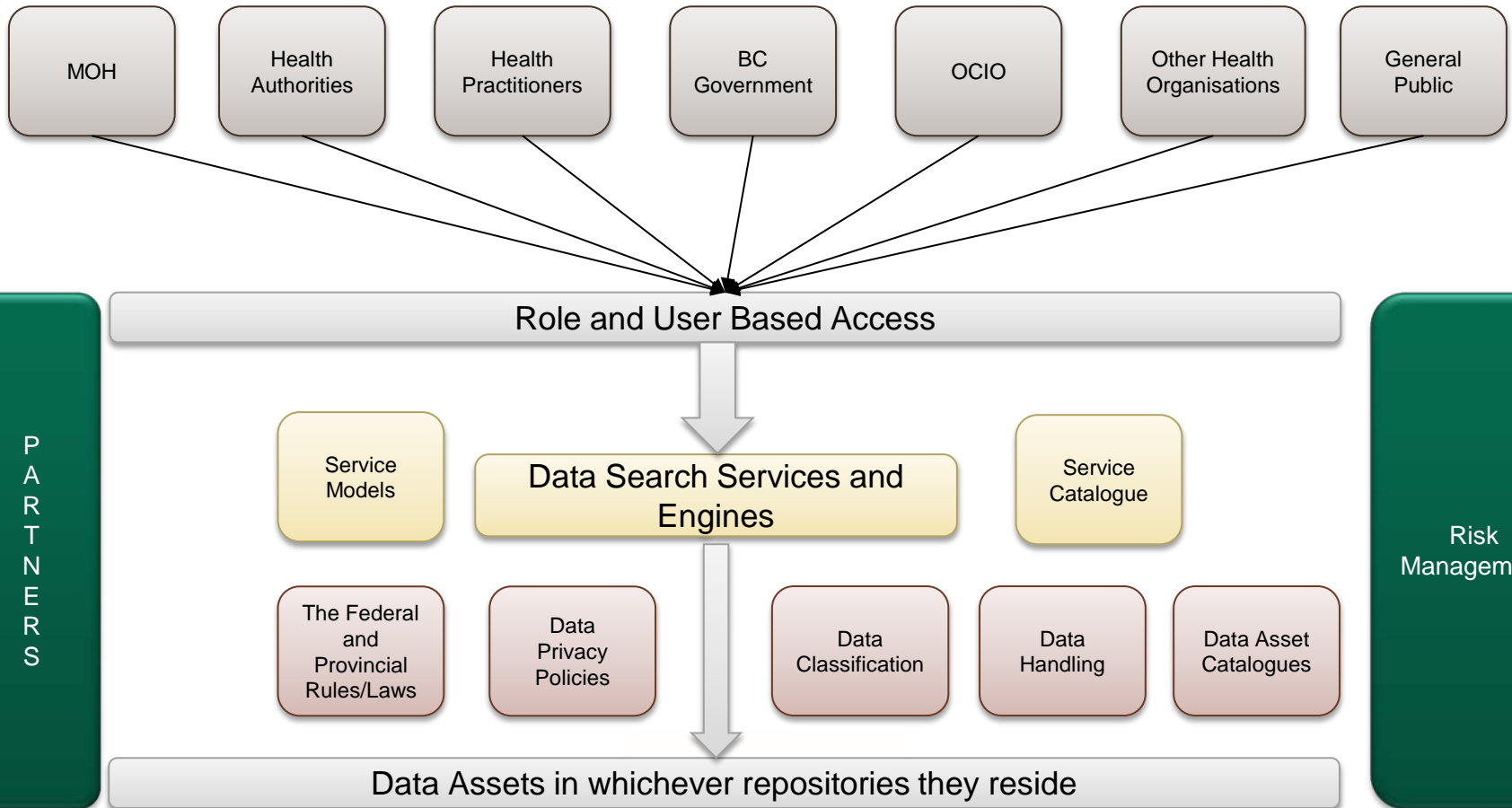- Datasets
- Asset Group
- Sharing Process

Start → Type

Unstructured Data

Structured Data

Need to Involve IP IT

No

Yes

Top Down

Bottom Up

End

Draft Classification / Sharing Process

Data Sharing Environment

Small Proof of Concept Projects with Value

| MOH | Health Authorities | Health Practitioners | BC Government | OCIO | Other Health Organisations | General Public |

Role and User Based Access

PARTNERS

Service Models

Data Search Services and Engines

Service Catalogue

Risk Management

The Federal and Provincial Rules/Laws

Data Privacy Policies

Data Classification

Data Handling

Data Asset Catalogues

Data Assets in whichever repositories they reside

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Summary

- Timing and organisational readiness are favourable

- Initial approach is supported by both internal and external stakeholders

- Proof of concept engagements are next - once refined and proven, model should be extensible

- The nature of the transition/adoption will require a significant change management effort over a 3-4 year period

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