HDP Training and Education

Course 4: Privacy Breaches and Reporting

BRITISH COLUMBIA
Ministry of Health

HSIAR
Innovation Through Analytics

HDPBC
Health Data Platform

Course 4 Learning Objectives

- Learn what is a privacy breach
- Learn how to prevent privacy breaches
- Learn how to report an HDP privacy breach

Privacy Breach Definitions

- A Privacy breach is any unauthorized access to, collection, use, disclosure, storage, transmission or retention of Personal Information

Types of Privacy Breaches

- A deliberate re-identification by the data recipient (or by their staff or subcontractors)
- An inadvertent re-identification by the data recipient (or by their staff or subcontractors)
- A data breach, where data are accidentally exposed to a broader audience

Examples of Privacy Breaches

- Accessing or searching records that are not related to your authorized purpose.

- Sharing your passwords to HDP systems with anyone.

- Sending personal information to the wrong place (internal or external)
  - Misdirected faxes, emails, mail, etc.

- Storing personal or confidential information on unencrypted portable media (such as USB memory sticks)

- Unsecured Transmission of Personal Information (e.g. bypassing HDP Output Process)

- Collecting information that is not required for the authorized research studies you are conducting (need to know vs. nice to know).

- Not securing personal information.

Types of disclosure

- Identity disclosure
  - When an individual can assign an identity to a record in a data set (i.e. line five is John smith)

- Attribute disclosure
  - When an individual learns of a sensitive attribute associated with the data set, which can then be linked to a particular individual without needing to know which specific record belongs to that patient

Impact of Privacy Breaches

- Humiliation or Embarrassment
- Delays in Care, No Care, Avoidance of Care
- Fraud and identity theft
- Financial and/or emotional Harm
- Damage to Relationships or Reputation
- Loss of Business Opportunities
- Harassment/ Physical Harm
- Loss of trust in Government, Researchers, and/or Care Providers

What can happen if you are responsible for a privacy breach?

- Fines
- Lawsuits
- Suspension/Termination
- Invasive Media Attention
- You and your colleagues could lose access to HDP
- Negative impact on reputation

Tips and Good Practice Guidelines

1. **Only access information that is part of your approved purpose.**
   1. Only do what you are approved to do.
   2. If for some reason there is a unforeseen barrier to data access, DO NOT act outside your approval. Instead, submit a data access amendment and await approval.

2. **Ensure only approved team members access the environment**
   1. If you need a new team member to have access amend your approval to reflect that

Tips and Good Practice Guidelines

3. Protect your user credentials and password and don’t share them with anyone. Not even IM/IT.

4. Always lock or log out of your computer. Don’t leave it logged in an unattended.

5. Ensure you are somewhere private when working remotely and those who are unauthorized to view your data cannot view the data.

6. Ensure that you do not access HDP Systems from outside of Canada

Tips and Good Practice Guidelines

7. **Treat the information in the HDP as strictly confidential.**

8. **Ensure any transmission of data or information is done in a HDP approved manner**

9. **Ensure outputs meet the output standards.**
   - Never circumvent the output process. Even if you think your just writing down a simple number on a sheet of paper take it through the output process first.
   - Only remove something from the environment once it has been approved

Tips and Good Practice Guidelines

10. If you are unsure: don’t assume. Always ask your manager, supervisor, or privacy officer

11. Report potential or actual Breaches ASAP to your manager, supervisor, and 7-7000 (link)

Privacy Breach Reporting

HDP Access is Audited. HDP will perform audits and checks to ensure that privacy protections are being upheld. Data consumers are always expected to protect information.

If you suspect a Privacy Breach has occurred, you must notify HDP immediately by emailing MoHAnalytics@gov.bc.ca outlining the nature of the breach. Also contact your manager/supervisor and 7-7000

- **Contact Info**
  Privacy team: HealthInformationPrivacy@gov.bc.ca
- Security team: HLTHInfoSec@gov.bc.ca

End Course 4

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