Manitoba Centre for Health Policy

Accreditation 2020
Privacy, Security and Confidentiality
Modules

• **Introduction to MCHP**  History, operations, resources and products of MCHP

• **Data Repository and Research Resources**  Databases housed in the Data Repository and Research Tools for using and analyzing the data: Research Protocol, Glossary, and Concept Dictionary

• **Administrative Requirements and Research Support**  Services and Assistance provided

• **Privacy, Security and Confidentiality**  Access, use, and disclosure of MCHP data, i.e., the legal requirements, basically obligations and how to meet them

• **Project Costs and Timelines**
De-Identified Data

• Data at MCHP is de-identified.
  • You will not find any specific identifiers, e.g. name; full address; phone; SIN; real PHIN
  • Users will not attempt to identify individuals (themselves or others) within the data for any reason.

• Some other group/individual fields are modified.
  • Limits accidental identification of individuals
PHIA Requirements - MCHP

• MCHP is a Research Organization under PHIA (Personal Health Information Act) Section 24.
  • 24(1) Disclosure
  • 24(2) Purposes
    (a) analyzing the health status of the population;
    (b) identifying and describing patterns of illness;
    (c) describing and analyzing how health services are used;
    (d) analyzing the availability and adequacy of human resources required to provide health services;
    (e) measuring health system performance;
    (f) health system planning.
PHIA Requirements - Researchers

- 24(1)(2) Approvals for Disclosure – HIPC, HREB
  - Researcher (disclosure for use)
- 24(3) Conditions
  - Importance, Need to identify
  - Safeguards, de-identify, destruction
- 24(4) Agreement
  - Researcher Agreement, Pledge of Confidentiality, Not to publish individual level data, Limited purposes, Destruction
- 24(3), (5) Consent
  - Unreasonable or impractical to obtain & no individual contact, Direct contact requires consent from the individuals
Approvals

• MCHP Review

• Health Information Privacy Committee (HIPC)

• U of M Rady Faculty of Health Sciences Health Research Ethics board (HREB). Must be submitted by a Researcher associated with U of M or WRHA.

• Other data providers (WRHA, Dept. of Families, Manitoba Justice, FNHSSM, etc…) where necessary

• Researcher Agreement (signed by PI delegated responsible for research team)

• MCHP Accreditation

• Student (MSc, PhD must be submitted with identified Advisor)
Limited Access & Use

- Access to the data is limited to those who require access AND have appropriate approvals and permissions
- System access is limited to identified and accredited individuals
- Use of the data is limited to approved purposes
- Provided project space (directories/libraries) must be used
- Accreditation must be attended, and validated annually
Limited Release

• Data cells representing 1-5 individuals or events must be suppressed

• Copy of publication or presentations must be sent to data providers and MCHP a minimum of 30 days prior to release

• Vetting and transfer of aggregated data and results for external researchers/analysts
Remote Access Vetting Process

MCHP Data Vetting Pickup – Pick up vetted output (External Link – RSA Token Required)
https://vetting.cpe.umanitoba.ca/

MCHP Request File Vetting – Request file to be vetted for transfer out of MCHP (Internal MCHP Link)
https://vetting.cpe.umanitoba.ca/
Additional Data

• Must be facilitated through MCHP data acquisition team

• Approvals
  • Data sharing agreement
  • Informed consent

• Process of transfer
  • Blind process
  • No specific identifiers
  • No release of ‘value added’ data

• Limited Access (Project only)

• PI is responsible for costs and approvals

• Results from project specific sources follow the same release requirements (small cell suppression) even if consent is provided.
MCHP: Audits and Reviews

- Ensure compliance and protection
  - Approvals (U of M, MHSAL, others...) ongoing
  - Data access
  - System access
  - Publication review
  - Forms (RA, Confidential Data)
U of M Pledge of Confidentiality

• Required for everyone with access to Personal Health Information, MCHP staff, project PI, and individuals with MCHP system access.

• Required to be completed for HREB submission

• Completion of the U of M MCHP Associated PHIA Orientation material and corresponding Pledge of Confidentiality is required

• U of M PHIA & Pledge of Confidentiality must be completed even if PHIA orientation has been completed with a different organization (e.g. WRHA, Province of Manitoba).
Thank You / Questions

- [umanitoba.ca/centres/mchp](https://umanitoba.ca/centres/mchp)
- [facebook.com/mchp.umanitoba](https://facebook.com/mchp.umanitoba)
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  (@um_mchp)