



## **TGLN Auditing Program: iTransplant Donor Management System**

522 University Avenue, Suite 900  
Toronto, ON M5G 1W7  
Tel: 416 363-4001  
Fax: 416 363-4002  
Website: [www.giftoflife.on.ca](http://www.giftoflife.on.ca)

Trillium Gift of Life Network (TGLN) is authorized to collect Personal Information (PI) under the Trillium Gift of Life Network Act (The Act). In accordance with legislation and its organizational privacy policy, TGLN limits use and access to PI on a “need-to-know” and “need to use” basis. Meaning that access to donor records on iTransplant (iTx) should be based on the iTx user’s role and responsibility.

TGLN employs various methods to safeguard and protect PI, including auditing of donor records to ensure that access and use of the record is for the purposes of facilitating donation and transplantation, and is not being accessed inappropriately or for unauthorized purposes. An audit trail is created by iTx, which records the user, date/time of access and page viewed each time an authorized iTx user accesses electronic donor records on the system.

TGLN will conduct regular audits on records stored on iTx. Audits are conducted quarterly on the records of randomly chosen donor identification numbers and/or users. In addition, TGLN may conduct audits on the records of high-interest, or public cases; and/or in response to suspected breaches of privacy.

The purpose of the audit is to ascertain that iTx user access to a donor record is for purposes consistent with his/her role and responsibility.

Audits and investigation will be conducted by the Privacy Officer in collaboration with the relevant Managers/Directors. The Manager/Director and/or Privacy Officer will follow-up with an individual to understand where a deviation has been identified between what was accessed and what should be accessed based on the iTx user’s profile. Where unauthorized access has been identified, investigated and confirmed, disciplinary action may be enforced, including additional training/education up to termination of employment.

Users of iTx are expected to use iTx appropriately and consistently to the terms and conditions of the iTx User Agreement, TGLN Privacy Policy and The Act.