

Privacy Impact Assessment

ImPACT Testing – UNBC Athletics and Accelerated Sport & Spine Physiotherapy

Form adapted from the BC Government template for Non-Ministry Public Bodies. June 2014

PIA# 16-015 (Office of the University Secretariat to assign)

Why do I need to do a PIA (Privacy Impact Assessment)?

Section 69(5.3) of the *Freedom of Information and Protection of Privacy Act* (FIPPA) requires the head of a public body to conduct a privacy impact assessment (PIA) in accordance with the directions of the minister responsible for FIPPA. Public bodies should contact the Information Governance Officer to determine internal policies for review and sign-off of the PIA. If you have any questions about this PIA template or FIPPA generally, please contact Adam Cullum (Information Governance Officer) at adam.cullum@unbc.ca or (250) 960-5139 or visit <http://www.unbc.ca/foippa>.

What if my initiative does not include personal information?

Public bodies still need to complete Part 1 of the PIA and submit it along with the signatures pages to Information Governance Officer even if it is thought that no personal information is involved. This ensures that the initiative has been accurately assessed.

Part 1 – General

Name of Department:	UNBC Athletics and Recreation		
PIA Drafter:	Loralyn Murdoch		
Email:	Loralyn.Murdoch@unbc.ca	Phone:	Ext 26368
Program Manager:	Loralyn Murdoch		
Email:	Loralyn.Murdoch@unbc.ca	Phone:	Ext 26368

In the following questions, delete the descriptive text and replace it with your own.

1. Description of the Initiative

To provide baseline concussion testing administered through Accelerated Sport & Spine Physiotherapy on behalf of UNBC Athletics and Recreation through the use of "The ImPACT test".

2. Scope of this PIA

The initiative impacts all student athletes before they are able to join UNBC Timberwolves teams and a follow up test is administered once every two years. If a student athlete reports a concussion, there are protocols that raise the frequency of testing to ensure the student athlete is fit to practice.

3. Related Privacy Impact Assessments

N/A – While not documented in a PIA, a disclosure form is in use that student athletes sign to communicate information between UNBC Athletics and Recreation, Accelerated Sport & Spine Physiotherapy and Pacific Sport which all have offices located in the Northern Sport Centre.

4. All Elements of Information or Data

student name, university the student attends with contact information, student's medical provider name with contact information, test results, aggregate statistical data, symptoms, age, weight/height measurements, personal health information, history of learning disabilities.

If personal information is involved in your initiative, please continue to the next page to complete your PIA.

If no personal information is involved, please submit Parts 1, 6, and 7 to the Information Governance Officer for review. You will receive support completing the remaining steps of the PIA.

COMPLETED INITIATIVE

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Part 2 – Protection of Personal Information

In the following questions, delete the descriptive text and replace it with your own.

5. Storage or Access outside Canada

Tests and Services provided by ImPACT require that information be entered into and stored in servers located in Vancouver, British Columbia with back up servers located in Toronto, Ontario. These servers are co-located servers that technical staff from ImPACT will be able to access from the Pittsburgh Pennsylvania Office when required. Accelerated Sport & Spine Physiotherapy acts as a service provider and stores the data resulting from their tests in their own file for the student athlete. Detailed personal information is not disclosed to UNBC Athletics and Recreation and is not kept on UNBC servers. Accelerated Sport & Spine Physiotherapy operates in the Northern Sport Centre in Prince George, British Columbia, Canada. Accelerated Sport & Spine does not have offsite back-up servers.

6. Data-linking Initiative*

In FIPPA, "data linking" and "data-linking initiative" are strictly defined. Answer the following questions to determine whether your initiative qualifies as a "data-linking initiative" under the Act. If you answer "yes" to all 3 questions, your initiative may be a data linking initiative and you must comply with specific requirements under the Act related to data-linking initiatives.

1. Personal information from one database is linked or combined with personal information from another database;	No
2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	No
3. The data linking is occurring between either (1) two or more public bodies or (2) one or more public bodies and one or more agencies.	No
If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.	N/A

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7. Common or Integrated Program or Activity*

<p>In FIPPA, “common or integrated program or activity” is strictly defined. Answer the following questions to determine whether your initiative qualifies as “a common or integrated program or activity” under the Act. If you answer “yes” to all 3 of these questions, you must comply with requirements under the Act for common or integrated programs and activities.</p>	
1. This initiative involves a program or activity that provides a service (or services);	Yes
2. Those services are provided through: (a) a public body and at least one other public body or agency working collaboratively to provide that service; or (b) one public body working on behalf of one or more other public bodies or agencies;	No
3. The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	No
Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.	N/A

** Please note: If your initiative involves a “data-linking initiative” or a “common or integrated program or activity”, advanced notification and consultation on this PIA must take place with the Office of the Information and Privacy Commissioner (OIPC) as well. Contact the Information Governance Officer to determine how to proceed with this notification and consultation in the early stages of developing the initiative, program or activity.*

8. Personal Information Flow Diagram and/or Personal Information Flow Table

Personal Information Flow Table			
	Description/Purpose	Type	FIPPA Authority
1.	Any new student athlete must complete an ImPACT test and have a baseline test score prior to beginning first day of official practice.	Collection	26(c)
2.	Baseline test results are collected by Accelerated Sport & Spine Physiotherapy, a service provider representing UNBC	Collection	26(c)

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	<i>Athletics and Recreation, which is attached to the athlete's physiotherapy file for providing a base score for their physiotherapist to track the athlete's condition to refer to in future tests.</i>		
3.	<i>UNBC Director of Athletics and the Timberwolves head coach are only notified of test results if future test results fall below the baseline score. The physiotherapist at Accelerated Sport & Spine Physiotherapy will only provide notification of concern that the student tested for a concussion and will not provide specific details of the test results.</i>	Disclosure	33.1 (1)(b), 33.1 (1)(e.1),
	<i>If there are any concerns that a student athlete has been tested positive for a concussion, the student athlete is pulled out of practice with the team and put on physiotherapy back to play protocols.</i>	Use	32(a), 32(b)
	<i>The student athlete retakes the ImPACT test and must have a baseline score that is higher than the original score in order for Accelerated Sport & Spine Physiotherapy to make the recommendation that the student athlete is able to resume practice. UNBC Athletics will not consider doctor's notes provided by the student athlete adequate enough documentation to resume practice.</i>	Collection, Disclosure & Use	26(c), 33.1(1)(b), 33.1(1)(e.1), 32(a), 32(b)
	<i>If the student athlete tries to transfer to another university to play, UNBC Athletics will disclose in the transfer form that the student has been tested positive for a concussion according to ImPACT tests administered by Accelerated Sport & Spine Physiotherapy.</i>	Disclosure	33.1(e)(i)
	<i>UNBC Athletics and Recreation may disclose that the student athlete tested positive for a concussion to the Canadian Interuniversity Sport Organization to help the student request relief to their eligibility of allowed play time to compensate for missed time due to being tested positive for a concussion.</i>	Disclosure	33.1(1)(b), 33.1(1)(c) → Canada Not for Profit Act s. 152) → CIS Bylaws 3.2.1 → CIS Governance Policy 5(d) → CIS Policy 40.20.2.6

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<p><i>Accelerated Sport & Spine Physiotherapy may disclose to student athletes their own physiotherapy file by providing them a copy of their paper file for the purpose of allowing students to transfer records to their doctor.</i></p>	<p>Disclosure</p>	<p>33.1 (1)(a) → 5(2)</p>
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9. Risk Mitigation Table

Risk Mitigation Table			
Risk	Mitigation Strategy	Likelihood	Impact
1.			
2.			
3.			

10. Collection/Use/Disclosure Notice

University of Northern British Columbia

UNBC Athletics and Recreation

Consent for the Collection, Use and Disclosure of Personal Information Collected Through ImPACT Tests Administered by Accelerated Sport & Spine Physiotherapy.

I hereby consent to the University of Northern British Columbia, Athletics and Recreation department allowing Accelerated Sport & Spine Physiotherapy to administer ImPACT tests designed to monitor student athlete concussions and recovery at the minimum of every two years. The administration of the ImPACT test is required for the purpose of:

- *Meeting eligibility requirements to join a Timberwolves team*
- *Providing physiotherapists a tool to positively identify when a student athlete has a concussion*
- *If a student athlete tests positive for a concussion, the ImPACT tests provides documentation to remove the player from practice for their own protection and the protection of team members*
- *Additional ImPACT tests can monitor recovery and provide records that the student athlete can provide to a medical professional for further clinical support.*

As a service provider representing the University of Northern British Columbia, Accelerated Sport & Spine Physiotherapy collects information from ImPACT test servers as per section 26(c) of the Freedom of Information and Protection of Privacy Act to receive information required to assess eligibility of student athlete to participate in UNBC Timberwolves practices and games, make a diagnosis of a concussion, or monitor the student athlete's recovery from a concussion.

Accelerated Sport & Spine Physiotherapy and UNBC Athletics and Recreation use the personal information from ImPACT tests as per section 32(a) to indicate the student athlete has met eligibility requirements to participate as a member of a Timberwolves team, to indicate a positive or negative test result to determine a concussion, and to assess a student athlete's recovery from a concussion.

Accelerated Sport & Spine Physiotherapy will not disclose specific details collected from ImPACT tests, but will only notify UNBC Athletics and Recreation if a student athlete tests positive for a concussion or fails to acquire a high enough score to indicate the student athlete has recovered from a concussion. UNBC Athletics and Recreation will disclose that a student has tested positive for a concussion as per section 33.1 (1)(b), 33.1 (1)(c) to assist the student athlete with requesting relief of eligibility to Canadian Interuniversity Sport or as per section 33.1 (1)(e)(i) as part of notifying the another university if a student athlete is attempting to transfer to another university team with a concussion.

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By taking the ImPACT test, I am accepting that the test is administered on ImPACT servers which are located in Vancouver, British Columbia with backup servers in Toronto, Ontario. ImPACT is an American company and my data may be accessed by ImPACT employees in Pittsburgh, Pennsylvania. I will be asked to provide demographic information including clinic name, student athlete name, association with UNBC, height, weight, gender, handedness, current medical systems, and my performance on the test will be recorded and stored on ImPACT servers.

Security measures taken to encrypt personal information I input into the ImPACT test, and collected by Accelerated Sport & Spine Physiotherapy when the test is completed are out of the control of UNBC. I understand that my personal information may be intercepted by international third parties or collected as part of the United States Patriot Act. I understand that UNBC cannot control unauthorized disclosure of information that occurs outside of UNBC's servers.

I understand that ImPACT manages my personal information as indicated in their privacy policy and terms and conditions found on <https://www.impacttest.com/legal/?Privacy-Policy-1> and <https://www.impacttest.com/legal/?Terms-and-Conditions-2> respectively which I am responsible for reading. I understand that I am responsible for maintaining and deactivating my online ImPACT account. Accelerated Sport & Spine Physiotherapy retains clinical records according to the College of Physical Therapists of British Columbia standards of practice. I understand that UNBC Athletics and Recreation will retain the limited information provided to them for one year and one day after my last day participating as part of a UNBC Timberwolves team.

I understand the purpose for taking the ImPACT tests and the risks to my privacy that accompanies taking the ImPACT test. If I have any questions regarding UNBC's management of my personal information as a student athlete I can contact Loralyn Murdoch at loralyn.murdoch@unbc.ca, or 250-960-6368. I can contact and discuss information about my ImPACT test results with my physiotherapist at Accelerated Sport & Spine Physiotherapy. I can contact and discuss the management of my personal information on ImPACT servers by contacting support@impacttest.com.

By signing below I accept this consent notice in its entirety as written. If I do not accept and sign below, I agree that I cannot take the baseline ImPACT test to protect myself from terms of this agreement that I cannot accept.

Full name: _____

(Please Print)

Signature: _____

Date: _____

Mailing Address: _____

Phone Number: _____

Student Number: _____

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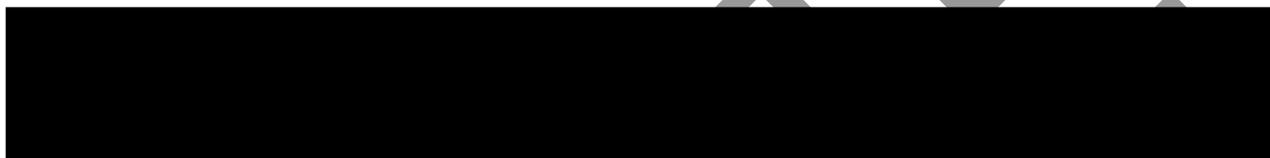
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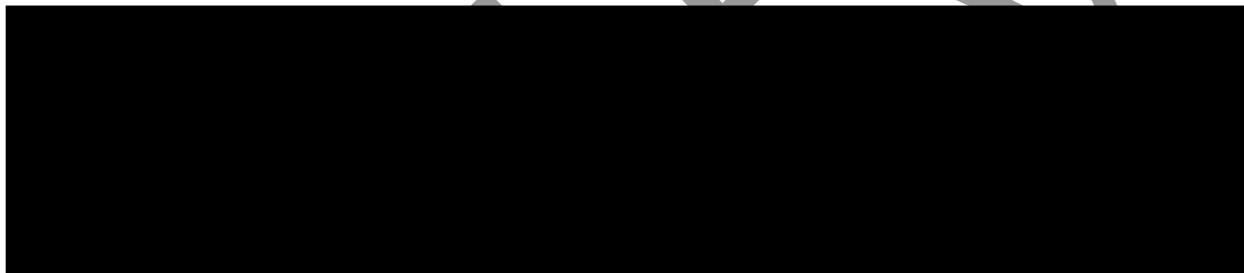
Part 3 – Security of Personal Information

Please consult with the Information Governance Officer, the Chief Information Officer or the IT Security Officer when filling out this section if you have any questions.

11. Please describe the physical security measures related to the initiative (if applicable).

A large black rectangular redaction box covering the answer to question 11.

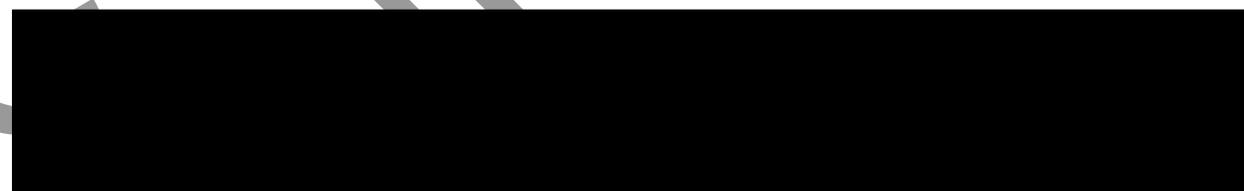
12. Please describe the technical security measures related to the initiative (if applicable).

A large black rectangular redaction box covering the answer to question 12.

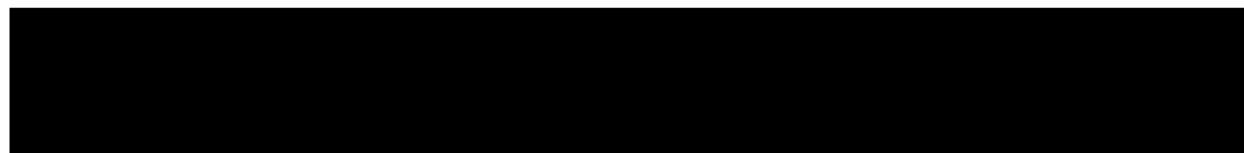
13. Does your department rely on any security policies? If so, indicate here:

A black rectangular redaction box covering the answer to question 13.

14. Please describe any access controls and/or ways in which you will limit or restrict unauthorized changes (such as additions or deletions) to personal information.

A large black rectangular redaction box covering the answer to question 14.

15. Please describe how you track who has access to the personal information.

A large black rectangular redaction box covering the answer to question 15.

Part 4 – Accuracy/Correction/Retention of Personal Information

- 16. How is an individual's information updated or corrected? If information is not updated or corrected (for physical, procedural or other reasons) please explain how it will be annotated. If personal information will be disclosed to others, how will the public body notify them of the update, correction or annotation?**

Athlete will have to contact Accelerated Sport & Spine Physiotherapy to correct any information that is relevant to their ImPACT test or medical file in general.

- 17. Does your initiative use personal information to make decisions that directly affect an individual(s)? If yes, please explain.**

Yes. The test determines if the student athlete is eligible to start or continue playing for a UNBC Timberwolves team.

- 18. If you answered "yes" to question 17, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

The ImPACT test is only as accurate as the information that the student athlete inputs into it. There is a possibility that the student athlete could sabotage the ImPACT test. Accelerated Sport & Spine Physiotherapy and UNBC are not responsible for the accuracy of the test.

- 19. If you answered "yes" to question 17, do you have a records retention and/or disposition schedule that will ensure that personal information is kept for at least one year after it is used in making a decision directly affecting an individual?**

Clinical files at Accelerated Sport & Spine Physiotherapy have a retention schedule that reflects the College of Physical Therapists of British Columbia standards of practice which is currently sixteen years after the last date of entry or age of majority whichever comes later. Student athletes are responsible for the maintenance of their ImPACT account.

Part 5 – Further Information

- 20. Does the initiative involve systematic disclosures of personal information? If yes, please explain.**

No.

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Please check this box if the related Information Sharing Agreement (ISA) is attached. If you require assistance completing an ISA, please contact the Information Governance Officer.

21. Does the program involve access to personally identifiable information for research or statistical purposes? If yes, please explain.

No.

Please check this box if the related Research Agreement (RA) is attached. If you require assistance completing an RA please contact the Information Governance Officer, the UNBC Research Office or UNBC Archives.

22. Will a personal information bank (PIB) result from this initiative? If yes, please list the legislatively required descriptors listed in section 69 (6) of FIPPA. Under this same section, this information is required to be published in a public directory.

The information taken from the ImPACT tests will be added to an already existing PIB maintained by Accelerated Sport & Spine Physiotherapy.

Please ensure Parts 6 and 7 are attached to your submitted PIA.

Part 6 – Information Governance Officer Comments

This PIA is based on a review of the material provided to the Information Governance Officer as of the date below. If, in future any substantive changes are made to the scope of this PIA, the public body will have to complete a PIA update and submit for approval.

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Part 7 – Program Area Signatures

Loralyn Murdoch
Project Sponsor/PIA Drafter

[Redacted Signature]

July 12/16
Date

N/A
Contact Responsible for Systems
Maintenance and/or Security
(if applicable)

N/A
Signature

N/A
Date

Adam Cullum
Information Governance Officer

[Redacted Signature]

July 12/16
Date

Once the PIA has been approved with or without conditions, the Information Governance Officer will collect signatures from the individuals indicated above. A copy will be provided to all signatories for convenience or to attach to a requisition or file with a contract.

A final copy of this PIA (with all signatures) will be kept on record with the Information Governance Officer.

