

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:	Wellness Services		
PIA Drafter:	Shelley McKenzie		
Email:	Shelley.McKenzie@unbc.ca	Phone:	25177
Department Manager:	Shelley McKenzie		
Email:	Shelley.McKenzie@unbc.ca	Phone:	25177

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

1. Description of the Initiative

OnCall Health is a virtual health care platform. OnCall Health delivers a secure, Canadian compliant video and messaging service. It allows UNBC employees and Northern Health Authority contractors the ability to continue delivering services remotely/virtually. This was precipitated by COVID-19 but we plan to continue post-COVID19.

This service will be used **in addition** to MOIS. While OnCall provides online scheduling and collection of session notes, etc... UNBC will not be utilizing that functionality. MOIS will remain our primary ERP/CRM for health & wellbeing.

In light of COVID-19, student wellness staff had to find ways to continue seeing patients/clients in a virtual way. Immediately, we moved to telephone appointments but there is a strong need for video sessions as well, especially when assessing a client/patient's mental health.

Northern Health practitioners are using doxy.me as their virtual platform for patient appointments, but that is not endorsed by UNBC. Zoom is also not a secure method of delivering this service.

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OnCall Health provides a higher level of security through its options of encrypted video, encounter-based messaging, and file sharing on any device.

2. Scope of this PIA

For use of student & employee health & wellbeing virtual medical appointments, counselling, wellness check-ins, and case management.

There is no pushing or pulling of UNBC data. OnCall platform is designed to work independently.

3. Related Privacy Impact Assessments

N/A

4. All Elements of Information or Data

UNBC will continue using MOIS as the primary information system that contains the sensitive and confidential patient/client data. All contact information, encounters, conditions and chart notes will remain in MOIS only.

Data requested from student/patient is only their name and email address. Date and time of the appointment, written notes from the provider that is added to the “notes for patient” may be viewable. Files attached by the provider or patient are stored inside the platform.

All personal information is deleted when no longer necessary to deliver the service or when a user closes their account.

Only basic UNBC employee provider information is required in the OnCall administrative platform in order to initiate virtual meetings.

If we choose to enable intake forms, this can be facilitated and stored through OnCall, but only that provider would have access to viewing it.

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.

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

None. Servers are privately hosted and located in Montreal Canada through an Amazon secure cloud.

6. Data-linking Initiative*

<p>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.</p>	
<p>1. Personal information from one database is linked or combined with personal information from another database;</p>	NO
<p>2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;</p>	NO
<p>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.</p>	NO
<p>If you have answered "yes" to all three questions, please contact the Information Governance Officer to discuss the requirements of a data-linking initiative.</p>	N/A

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.	UNBC Wellness Centre staff inform students that appointments will be delivered through the OnCall platform.	--	N/A
2.	Students will acknowledge the use of OnCall and have the opportunity to ask for an alternative method of receiving care after an informed discussion.	Collection / Consent	26(d)
	UNBC Wellness Centre will have the admin account managed by the Director of Health and Wellbeing and the	Use & Disclosure	32(b), 33.1(1)(b),

	<i>Student Services Representative - Wellness. This admin account can control which practitioners have access to which student information to limit access and provide direct service as needed. Practitioners accept students from a virtual waiting room, which is locked down to unique ID matching between the student and practitioner.</i>		33.1(1)(e), 33.1(1)(e.1), 33.1(1)(p.2)
3.	<i>Student goes into OnCall and provides their own email and name. They can provide other information if they want to; however, Wellness Centre staff will inform them that they are not required to put more information into the service to receive support.</i>	Collection	33.2(c) and 32(a)
	<i>Students meet within the OnCall videoconferencing environment with Wellness Centre staff. No personal information is recorded in features on OnCall. All personal information is kept within MOIS and Clockwork</i>	Use & Disclosure	32(b), 33.1(1)(b), 33.1(1)(e), 33.1(1)(e.1), 33.1(1)(p.2)

9. Risk Mitigation Table

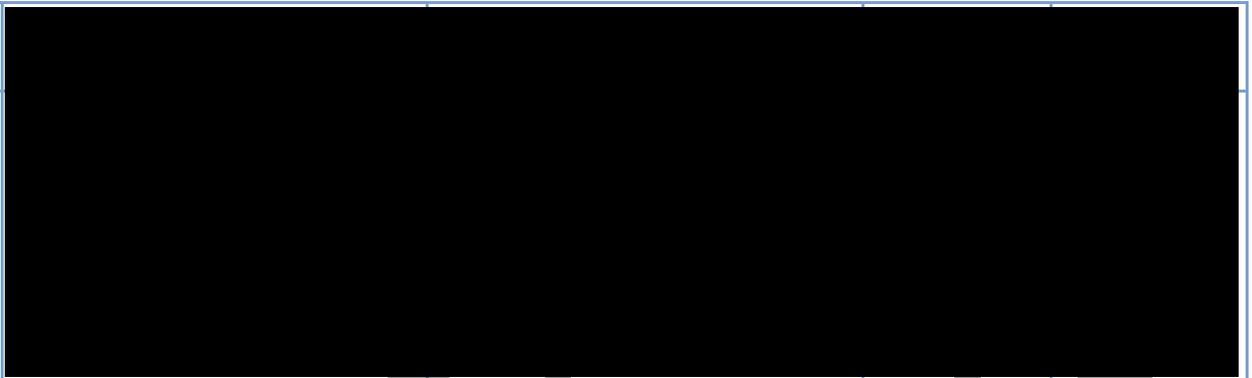
Please identify any privacy risks, even very unlikely ones, associated with the initiative and the mitigation strategies that will be implemented. Please provide details of all such strategies. Also, please identify the likelihood (low, medium, or high) of this risk happening and the degree of impact it would have on individuals if it occurred.

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

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3.	
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10. Collection Notice

Student will be asked to sign an alternative form for OnCall. While physical distancing measures are in place, a date/time stamped email printed as a memo demonstrating that the student agrees to the updated statement will be a suitable alternative. Combine both the agreement and the consent form into a PDF and place the combined file in the student's chart.

On the section of the existing UNBC Wellness Centre Client Information form the following section:

The UNBC Wellness Centre Record

An electronic record of the data collected while you are being provided services by members of the Wellness Team can be accessed by the Wellness Team. Your Wellness Centre record is stored on our electronic database(s). These records will be kept for sixteen years after your final visit. If you require copies of your records, you will need to collect them within sixteen years of your final visit.

will be replaced with the following language:

The UNBC Wellness Centre Record

An electronic record of the data collected while you are being provided services by members of the Wellness Team can be accessed by the Wellness Team. Your Wellness Centre record is stored on our electronic database(s). These records will be kept for sixteen years after your final visit. If you require copies of your records, you will need to collect them within sixteen years of your final visit.

The Wellness Centre also utilizes OnCall Health videoconferencing services to provide a means to conduct appointments when in-person appointments are not possible. The OnCall Health tool is provided by a third party service provider that is not managed by UNBC. You will need to provide your name and email address to OnCall to use this services. You are responsible for contacting OnCall Health to terminate your account when you no longer require the use of this service. Review OnCall's privacy policy before agreeing to this statement.

UNBC Wellness Centre staff will provide assistance reviewing the OnCall privacy policy as needed. OnCall Health also provides a consent form before customers use their service which can be referenced from within their privacy policy (See Appendix A).

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).

[REDACTED]

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

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

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.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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

[REDACTED]

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?

The patient/client provides only their name & email in the OnCall system. They can close their own account anytime, which then deletes information. The Student Services Representative/MOA can edit personal information at the request of the patient/client.

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

Yes. Developing care plans, safety plans, referrals, ordering labs/tests. DSMIV assessments. All of the sensitive personal information is stored in MOIS only and not in OnCall.

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.

Information obtained directly from the client/patient. Practitioners/MOA/SSRs confirm personal contact information during session or booking request.

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?

Will be compliant with practitioners' respective certifying body, BC privacy legislation, and per any existing UNBC record disposition schedules. All personal information is deleted when no longer necessary to deliver the service or when a user closes their account.

Part 5 – Further Information

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

No

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.

N/A

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

No – If OnCall Health gets asked for research or statistical purposes, it will never use personal nor personal health information, which is traceable to any individual; rather, it will fully anonymize information, meaning the risk of this information being traced back to a given individual is reduced to the greatest extent possible.

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.

N/A

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.

No

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

Part 6 – Comments, Conditions & Concerns

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.

UNBC Wellness Centre will need to complete a PIA amendment if they expand the use of the service to include it's administrative and charting management functionalities.

Part 7 – Program Area Signatures

Shelley McKenzie		21-Apr-2020
Name of Individual leading the Program/Project <i>(Normally the individual who completed the PIA)</i>	Signature	Date
Shelley McKenzie		
Director or Dean Overseeing the Program/Project	Signature	Date
Dave Kubert		
Contact Responsible for Systems Maintenance and/or Security <i>(if applicable)</i>	Signature	Date
Adam Cullum	Agreement to terms as per email chain	27-Apr-2020
Information Governance Officer (Privacy Officer)	Signature	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.