

# Privacy Impact Assessment for:

VIU Student Affairs: Jane App Practice Management  
Software for Healthcare Practitioners

## Part 1 - General

<b>Name of Department:</b>	VIU Student Affairs – Counselling Services		
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22(1)

### 1. Description of the Initiative

Under the oversight of VIU University Counsel, a PIA is being conducted to determine if Jane software can be used by VIU Student Affairs to provide technical administrative support to its Student Counselling Services department. Jane provides online patient booking, staff scheduling, billing, charting (including record collection and storage), and video conferencing to healthcare professionals via a cloud-based platform accessed by users via a web-browser interface. Counselling Services proposes accessing the following services in its contract with Jane: staff scheduling, scheduling patient appointments, charting (including record collection and storage) and video conferencing.

Jane software uses Amazon Web Services for data hosting and stores user accounts individually within its own database schema. A more comprehensive description of Jane’s data hosting, application security and security compliance are available on its [website](#). As part of the PIA process, a Security Threat Risk Assessment (STRA) has been conducted by VIU Technology department to assess the service at a technical level.

### 2. Scope of this PIA

The scope of this PIA is limited to the implementation and use of the Jane product in its standard configuration by VIU employees and students authorized to use this service. This PIA will identify personal information privacy risks and mitigation strategies.

### 3. Related Privacy Impact Assessments

There are no directly related PIAs completed within VIU.

**4. Elements of Information or Data** The information collected using Jane software depends on whether the individual is a VIU counsellor, administrative employee or student. Student Affairs will act as administrator and will make Jane available to new users as required.

Information Type	Information Collected
Personal Information	<b>From Students:</b> Name, student number, personal phone number and e-mail, educational program and year, home address, date of birth, age, gender, pronoun preference, name of healthcare practitioner and whether the student is also accessing additional mental health

	<p>professionals, medications being taken; status as registrant (or not) with VIU's Accessibility Services; mental health concerns, symptoms and issues (taken in the form of a checklist), chart notes (personal health information).</p> <p><b>From Third Parties:</b> Student is asked to provide the name, phone number and relationship to the student of the student's emergency contact person.</p> <p><b>From VIU Employees:</b> Counsellors and other VIU employees would be required to provide a first and last name and email address. Any other information is provided on a discretionary basis.</p>
Contact details	<p>The contact information provided by students (listed above) is considered "personal information" under FIPPA and not "contact information".</p> <p><b>From VIU Employees:</b> first and last names, usernames, passwords and email addresses would be provided as a part of account registration and creating staff profiles.</p>
Account information	User ID, answers to security questions and log-in information for student and non-student users.
Commercial information	In order for VIU employees to begin using the program, the VIU administrator creating the account would provide some business information for VIU for subscription invoices including billing address, contract number, email and a credit card to leave on file.

*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 unsigned to [fippa@viu.ca](mailto:fippa@viu.ca). A privacy advisor will be assigned to your file and will guide you through the completion of your PIA.*

**Part 2 – Protection of Personal Information**

**5. Storage or Access outside Canada**

Jane servers are located in Montreal, Canada.

**6. Data-linking Initiative\***

This is not considered a data-linking initiative as contemplated in s.36.1 of FIPPA.

<i>In FOIPPA, "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. If so, you will need to comply with specific requirements under the Act related to data-linking initiatives.</i>	
1. Personal information from one database is linked or combined with personal information from another database;	No



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2. The purpose for the linkage is different from those for which the personal information in each database was originally obtained or compiled;	N/A
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.	N/A
<b>If you have answered “yes” to all three questions, please contact a PCT Privacy Advisor to discuss the requirements of a data-linking initiative.</b>	

### 7. Common or Integrated Program or Activity\*

This initiative is not considered a common or integrated program or activity as defined in Schedule 1 of FIPPA.

<b>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.</b>	
This initiative involves a program or activity that provides a service (or services);	YES
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
The common or integrated program/activity is confirmed by written documentation that meets the requirements set out in the FOIPP regulation.	NO
<b>Please check this box if this program involves a common or integrated program or activity based on your answers to the three questions above.</b>	N/A

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

Personal Information Flow Table				
	Description/Purpose	Personal Information	Type	FIPPA Authority
1.	Health and Wellness Services administration opens a file on the Jane platform for each student choosing to access counselling services; this generates an intake form that is sent directly to the student.	When front desk staff are creating an account for a student they will be require to provide their Name, Student Number, E-mail address & Phone Number. Students will have the ability to create an online account (if they wish) to view previous appointments and profile information. It is within this online option that they would create their login information (e-mail or username) and password. Metadata of participant (assuming login name was personally identifiable).	Collection	26(c)
2.	The student completes the intake form which continues to be stored on the Jane database.	<b>Students:</b> Name, student number, home phone number and address, e-mail address, date of birth, age, gender, pronoun preference, educational program and year,	Collection Retention	26(c) 31

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		<p>name of healthcare practitioner and whether the student is also accessing additional mental health professionals, medications being taken; status as registrant (or not) with VIU's Accessibility Services; mental health concerns, symptoms and issues (taken in the form of a checklist).</p> <p><b>Third Parties:</b> Name, phone number and relationship to the student of the student's emergency contact person.</p> <p><b>VIU Employees:</b> Counsellors creating chart notes will have their name associated with the notes they have written and these notes would be stored in the patient profile and chart.</p>		
3.	Throughout the period of service provided to the student by the counsellor, the students chart would be uploaded to and stored on the Jane server.	Students' personal health information; possibly the personal information of third parties if shared by the student.	Collection Retention	26(c) 31

### 9. Risk Mitigation Table

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact
1.	Employees could access personal information and use or disclose it for personal purposes	Role-based access (flexible privacy levels according to staff user).	Low	High
2.	User's personal information is compromised when transferred to or stored by the service provider	Transmission data is encrypted in transit and at rest and Jane has a role-based access control in place. Jane also completes penetration testing and have data loss measures in place.	Low	High
3.	Jane's privacy policy includes notification that patient data	A Jane representative has indicated that this is not	Medium	High (Automatic FIPPA breach)

<p>(including chart notes) can be accessed by Jane employees and used “in order to better understand how our customers are using Jane and how we can make changes to Jane based on those needs.” Jane’s privacy policy reads in part:  <i>Anonymized/Aggregated Data. Jane may use computer-generated algorithms to gather anonymous and aggregated information from our Subscribers and their Patient Data in order to assist in our continued development and improvement of the Services, and for research, data analysis, benchmarking, statistics or trend analysis. We will ensure that none of the information we gather identifies, or could be used to identify, any user or patient. Jane may share such anonymized information with Subscribers and others, for example, by providing insights into most common conditions, most popular treatments or benchmarking fees against industry or regional norms.</i></p>	<p>currently done (and hasn’t historically been), [REDACTED]</p>		
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s.21(1)

**10. Collection Notice**

The pertinent portion of the existing New Student Intake Form language on confidentiality reads:

*All information gathered is for the purpose of providing counselling services. The VIU Health and Wellness Team shares a unit of confidentiality, including counselling team members on all VIU campuses. Thus, your counsellor may consult with colleagues within VIU’s Health and Wellness programs to ensure safety and quality of care. No information will be released to VIU administrators, instructors, outside agencies or anyone else unless authorized by you or required by law. As with all Counselling Services, we may set aside confidentiality when there are reasonable grounds to believe: a person under the age of 19, or otherwise vulnerable needs protection; individuals are likely to cause injury to themselves or others [or] we are ordered by a court to provide confidential information. Confidentiality of information communicated by electronic means cannot be guaranteed. If you choose to use email to communicate with the Counselling Centre, please be aware that information could be viewed by others. If you have any*



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questions or concerns about privacy, please refer to the orientation letter for further details and feel free to discuss with your counsellor.

**This is to be revised to indicate that collection is pursuant to s.26 of FIPPA and will read:**

### Collection Notice and Confidentiality:

Your personal information is collected under the Authority of Section 26(c) of the Freedom of Information and Protection of Privacy Act (FIPPA). This information will be used for the purpose of

providing you with counselling service. This includes: scheduling of counseling appointments; accessing and maintaining your counselling records; and any other purposes that are reasonably connected to providing you with counselling services. Questions about the collection of this information may be directed to [fippa@viu.ca](mailto:fippa@viu.ca)

The VIU Health and Wellness Team shares a unit of confidentiality, including counselling team members on all VIU campuses. Thus, your counsellor may consult with colleagues within VIU’s Health and Wellness programs to ensure safety and quality of care.

Disclosure of your personal information will not be made to anyone within VIU unless you consent to the disclosure or the information is necessary for the performance of their employment duties. Your personal information will not be disclosed to anyone outside of VIU unless authorized by you or required by law. As with all Counselling Services, we may set aside confidentiality when there are reasonable grounds to believe: a person under the age of 19, or otherwise vulnerable needs protection; individuals are likely to cause injury to themselves or others [or] we are ordered by a court to provide confidential information. Confidentiality of information communicated by electronic means cannot be guaranteed. If you choose to use email to communicate with the Counselling Centre, please be aware that information could be viewed by others. If you have any questions or concerns about privacy, please refer to the orientation letter for further details and feel free to discuss with your counsellor.

## Part 3 – Security of Personal Information

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

VIU requires data centers to comply with a detailed set of security requirements. Jane is hosted on external cloud-based commercial infrastructure sites in Canada with data center infrastructure meeting or exceeding VIU standards.

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

• [Redacted text]

s. 15(1)(l)

- [REDACTED]

**13. 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.**

Account Owner (HWC Manager) will have the ability to add/delete users in addition to front desk staff accessibilities

Counsellors will have the ability to make changes to patient chart, create/edit charting notes, add documents to chart

Front desk staff will have the ability to make changes to patient chart information (demographics/contact info) but they will be unable to view/edit charting notes or any documents associated with the patient chart

Students will only have the ability to update their contract information online and view their appointments, but they will be unable to view/edit charting notes

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

[REDACTED]

[REDACTED]

[REDACTED]

s. 15(1)(l)

**Part 4 – Accuracy/Correction/Retention of Personal Information**

**15. 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**

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### **personal information will be disclosed to others, how will the ministry notify them of the update, correction or annotation?**

Students will have the ability to edit their login info including password. No other user will have the ability to do this. They will be able to update their contact information online as well.

Patient chart demographics can be edited by counsellors, front desk or account owner.

Only counsellors will have the ability to view and/or update chart notes

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

Yes – counselling initiatives may be influenced by a review of a student’s chart, as could decisions that would affect the student where, for example, there is a public health and safety concern relating to the student that would necessitate disclosure of their personal information.

### **17. If you answered “yes” to question 16, please explain the efforts that will be made to ensure that the personal information is accurate and complete.**

The Health and Wellness Centre utilizes an Intake Form that is required to access Counselling Services. The form requires a personal information section to be filled out by the student. These intake forms are updated yearly to ensure that information is accurate and complete. Jane Software grants students have access to an online platform that will allow them to view and update their personal information such as phone number, address, emergency contacts, etc. This will not give them access to any charting records or documents that have been created or added by a Practitioner. Any individual wishing to access their healthcare records and the Health and Wellness Centre will be able to do so following completion of a Release of Information form.

### **18. If you answered “yes” to question 16, do you have approved records retention and 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?**

Yes – account owners will be able to request to Jane that patient and chart information is deleted as required by legislation. No other user can make this request. Once deleted, all information is removed from Jane servers.

## **Part 5 – Further Information**

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

This initiative does not involve the systematic disclosure of personal information.

### **20. Access for Research or Statistical Purposes**

This initiative does not involve disclosure of personal information for research purposes.

### **21. Other Applicable Legislation**

N/A

## **22. Other**

N/A

### **Additional Concerns:**

Jane's privacy policy discloses that should users log in to the software using social media accounts, Jane will receive their personal information such as name and email address.

Jane uses cookies on its website, but settings can be managed by users through "settings" or "options" menus.