



Health and Wellness Centre

Initiative:	Physiotherapy Clinic at HWC
Department or Service Area Name:	Student Affairs, Health & Wellness Centre

Part 1 – General Information and Overview 1

Part 2 – Collection, Use, and Disclosure 4

Part 3: Storing Personal Information..... 9

Part 4: Assessment for Disclosures of Sensitive Personal Information 9

Part 5: Security of Personal Information 10

Part 6: Accuracy/Correction/Retention of Personal Information 13

Part 7 – Personal Information Banks..... 14

Part 8 – Further Information..... 15

Part 9 – Summary and Proponent Responsibility 16

Part 10: Signatures..... 16

Part 1 – General Information and Overview

1.1 What is the Initiative?

Describe your initiative in enough detail that a reader who knows nothing about your work will understand the purpose of your initiative and who your partners and other stakeholders are. Describe what you’re doing, how it works, who is involved and when or how long your initiative runs.

VIU Health and Wellness Centre wants to offer private physiotherapy services on-site to employees and students. Services would be contracted to a private physiotherapist. Electronic Medical Records and Scheduling would utilize Jane App, which is currently used by Health and Wellness Centre Counselling.

Students & Employees would book appointments with HWC Front desk staff using Jane App. Client would see physiotherapist at Health and Wellness Centre. Physiotherapist would chart on Jane App. All payments for services to be handled and directed to physiotherapist. Front end staff to print invoice receipt for client to submit to extended health insurance for reimbursement.

Start date as soon as possible. Contract to be created for one year and evaluate for continuation.

Health and Wellness Centre

1.2. What is the scope of the PIA?

Your initiative might be part of a larger one or might be rolled out in phases. What part of the initiative is covered by this PIA? What is out of scope of this PIA?

Scope of the PIA limited to use of the Jane App and collecting of confidential information. In addition, there would be private physiotherapist who would be accessing and collecting confidential information.

1.3. Are there any related Privacy Impact Assessments?

Please indicate if this an update on an existing PIA or an additional module that was not covered in the original PIA.

PIA Jane App completed Feb 2023 for Health and Wellness Centre.

1.4. What are the data or information elements involved in your initiative?

In the table below, please list all the elements of information or data that you might collect, use, store, disclose or access as part of your initiative. If your initiative involves large quantities of information or datasets, you can list categories or other groupings of personal information in an appendix.

Information Type	Information Collected
Personal Information	<p>From Students/Employee Clients: Name, DOB, gender, Student number, PHN, Extended health benefits information, medical history, primary care provider musculoskeletal health concerns, symptoms and issues</p> <p>From Third Parties: Name & Phone number of emergency contact</p> <p>From VIU Employees: First & Last name, email address</p>
Contact details	<p>From Students/Employee Clients: Phone number, email, address</p> <p>From Third Parties:</p> <p>From VIU Employees:</p>
Account information	User ID, answers to security questions and log-in information for student and non-student users.
Commercial information	Jane App currently in use. Business information for VIU is shared including billing address, contact number, email and credit card on file

Health and Wellness Centre

1.4a. Did you list [personal information](#) in question 1.4?

Personal information is any recorded information about an identifiable individual, other than business contact information. Personal information includes information that can be used to identify an individual through association or reference- see the table below for examples of Personal Information.

Business contact information, in turn, is defined as information to enable an individual at a place of business to be contacted and includes the name, position name or title, as well as business telephone number, address, email or fax number of the individual. BC FIPPA does not protect business contact information.

Examples of Personal Information	
<ul style="list-style-type: none"> • Name, age, sex, weight, height • Home address, phone number • Race, ethnic origin, sexual orientation • Medical information • Health history • Number or symbol assigned to the individual • Income, purchases and spending habits • Blood type, DNA code, fingerprints 	<ul style="list-style-type: none"> • Marital or family status • Religion • Education • Financial information • Criminal information • Employment information • Personal views or opinions, except if they are about someone else

- If yes, go to [Part 2](#)
- If no, answer question 1.5 and submit questions 1 to 1.5 to pia@viu.ca. You do not need to complete the rest of the PIA template.

Yes

1.5. How will you reduce the risk of unintentionally collecting or disclosing personal information?

Some initiatives that do not require personal information are at risk of collecting, using, or disclosing personal information inadvertently, which could result in an information incident.

Click or tap here to enter text.

Health and Wellness Centre

Part 2 – Collection, Use, and Disclosure

This section will help you identify the legal authority for collecting, using, and disclosing personal information, and confirm that all personal information elements are necessary for the purpose of the initiative.

2.1 Four point “Necessity Test” for the collection, use, and disclosure of Personal Information.

To determine if the Personal Information from your initiative meets the necessity threshold, apply the following four-point test to each element of PI from 1.4 above. Note that each element of PI must meet all four points of the test.

Four point “necessity test” for collecting personal information ([OIPC Canada, 2016](#)).

1. The information is rationally connected and demonstrably necessary to an operating program or activity
2. The information is likely to be effective in meeting the objectives of the program or activity
3. There are no other less privacy-invasive ways to effectively achieve the objectives of the program or activity
4. The loss of privacy is proportional to the objectives of the program or activity

Personal Information element	Does it meet all four points of the necessity threshold?	Reasons for keeping or excluding from initiative
Name	Yes	Necessary for accessing services, documentation & insurance submission
Date of Birth	Yes	Necessary for insurance submission
Address, Phone number	Yes	Necessary for client contact, insurance submission
Health History	Yes	Necessary for treatment
Appointment charting documentation	Yes	Necessary for meeting regulation standards regarding physiotherapy documentation and insurance audit

Health and Wellness Centre

2.2 Personal Information Flow Diagram and/or Personal Information Flow Table

In the table below, list the personal information from question 1.4. Think about how each element of information flows through your project. Your Privacy Officer can help you figure out whether each step is a collection, use, or disclosure, and whether you have the legal authority for the way you're working with the information. Alternatively, you can attach a flow diagram to this PIA. Add rows as necessary.

	Describe the way personal information moves through your initiative step by step as if you were explaining it to someone who does not know about your initiative.	(Collection, Use or Disclosure)	FIPPA or other legal authority
<i>E.g.</i>	<i>E.g., Student email, password, and IP address collected by software platform for account creation.</i>	<i>Collection</i>	<i>FIPPA 26(c) "info relates to and is necessary for a program or activity"</i>
1.	<p>Health and Wellness Services administration opens a file on the Jane platform for each student/employee choosing to access physiotherapy services; this generates an intake form that is sent directly to the student.</p> <p>When front desk staff are creating an account for a student they will be required to provide their Name, Student Number (if applicable), E-mail address & Phone Number. Students/employees 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.</p>	Collection	26(c)
2.	<p>Student/employee completes the intake form which continues to be stored on Jane database. Client attends appointment and Physiotherapist charts regarding client diagnoses, treatment, plan.</p> <p>Students/Employee Clients: Name, student number (if applicable), home phone number and address, e-mail address, date of birth, age, gender, pronoun preference, name of healthcare</p>	Collection Use	26(c) 32(a)(b)

Health and Wellness Centre

	<p>practitioner, medical history; musculoskeletal health concerns, symptoms and issues (taken in the form of a checklist).</p> <p>Third Parties: Name, phone number and relationship to the student of the student's emergency contact person.</p> <p>VIU Employees: Physiotherapist 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.	Client pays for services directly to Physiotherapist via Credit card, Interac or cash payment.	Collection	26(c)
4.	HWC Administration prints invoice receipt for client with type of payment to be submitted to client's extended benefits for reimbursement		
5.	<p>Throughout the period of service provided to the student/employee by the physiotherapist, the students/employee's chart would be uploaded to and stored on the Jane server.</p> <p>Student/employee's personal health information.</p>	<p>Collection</p> <p>Use</p> <p>Disclosure</p>	<p>26(c)</p> <p>32(a)(b)</p> <p>33(2)(d)</p>
6.			

Health and Wellness Centre

2.2 Risk Mitigation Table

Thinking through the information flow, identify where there are risks for privacy incidents or data breaches. For each risk, identify a mitigation strategy, as well as the likelihood of an incident, and level of impact or harm if people's information were breached.

Risk Mitigation Table				
	Risk	Mitigation Strategy	Likelihood	Impact/harm
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				
4				

2.3. Collection or Privacy Notice

If you are collecting personal information directly from an individual the information is about, FIPPA requires that you provide a collection notice, also known as a privacy notification.

A collection notice must contain the following elements:

- The legal authority and section under FIPPA under which you are collecting personal information.
- The purpose for which you are collecting the personal information and how it will be used.
- The contact information of an employee or officer at VIU who can answer questions about the collection of personal information.



Privacy Impact Assessment for:

Health and Wellness Centre

Contact the privacy office for a collection/privacy notice template.

Suggested Privacy Notification:

Vancouver Island University (VIU) is collecting your personal information under section 26(c) of the BC *Freedom of Information and Protection of Privacy Act (FIPPA)* for the purpose of providing physiotherapy services at the VIU Health and Wellness Centre (HWC).

In order to provide the Physiotherapy Services, it is necessary to collect Personal information including your name, date of birth, gender, student number, Personal Health Number (PHN), extended health benefits information, medical history, primary care provider information, and details related to your musculoskeletal health concerns, symptoms, and treatment needs. Your physiotherapy health file will be stored and managed on the Jane platform – an Electronic Medical record and clinic management company, which stores information on servers in Canada. Jane has undergone a Privacy Impact Assessment (PIA) and it is a commonly used and trusted health EMR.

The Health and Wellness Team operates as a unit of confidentiality. Your personal information will not be shared with VIU administrators, instructors, other university units, outside agencies, or any third parties unless:

- you have provided informed consent, or
- disclosure is required or permitted by law.

Efforts are made to protect the privacy and security of your information. However, confidentiality of information transmitted electronically cannot be guaranteed. If you choose to communicate with the HWC by email, please be aware that there is a risk your information could be accessed by others in the event of a security breach.

If you have questions about privacy practices or the collection, use, or disclosure of your personal information in relation to Physiotherapy Services, please contact:

VIU Health and Wellness Centre at _____ or the VIU Privacy Office at _____.

Health and Wellness Centre

Part 3: Storing Personal Information

3.1. Is any personal information being stored outside of Canada?

If you're storing personal information outside of Canada, identify the sensitivity of the personal information and where and how it will be stored.

Jane servers are located in Montreal, Canada.

3.1.1. Where is the personal information stored?

Jane App

3.2. Does your initiative involve sensitive personal information?

Examples of sensitive personal information include personal health information, genetic and biometric data, personal finances, geolocation data, criminal records, counselling records, HR records, payroll records, racial or ethnic origin, sexual orientation, religious, philosophical, or political beliefs, etc.

Yes. Personal information will include personal health information.

If **yes**, please complete [Part 4: Assessment for Disclosures of Sensitive Personal Information](#).

If **no**, skip to [Part 5: Security of Personal Information](#)

Part 4: Assessment for Disclosures of Sensitive Personal Information

Complete this section if you are disclosing sensitive personal information. You may need help from your organization's Privacy Officer.

4.1. Is the sensitive personal information stored by a service provider?

Yes. Sensitive personal information is stored on the Jane App.

Health and Wellness Centre

If yes, fill out the table below, then go to question 4.3. If no, continue to [question 5](#).

Information about Service Provider

Name of service provider	Name of cloud infrastructure and/or platform provider(s)	Where is the sensitive personal information stored (including backups)?
Jane	Jane	Secure SOC 2 audited servers based in Montreal

4.2. Provide details on the disclosure, including where and how the personal information is stored.

Answer this if question 4.1 does not apply. Be specific about where and how the information is being stored.

Click or tap here to enter text.

4.3. Is there a contract that includes privacy-related terms?

If there is a contract with the provider, please describe any privacy-related terms in the contract, or attach the privacy schedule.

No

Part 5: Security of Personal Information

Section 30 of FIPPA imposes a duty on the public body to prevent unauthorized access to Personal Information both internally and with any contracted third parties. As such, we need to make sure that personal information is safely secured in both physical and technical environments. For each item in this section, please describe the security measures for both the service provider and for VIU internally.

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

For example, physical security measures may include: the security environment of vendor's data centres; storing records containing PI in locked storage rooms, offices, and/or filing cabinets with controls over distributions of keys/access; locked workstations that do not permit others to view your screen (including when working remotely, etc.

Health and Wellness Centre

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.

Appointments take place in closed door medical exam rooms.

Jane has ability to blur patient names on schedule to increase confidentiality. In addition, only front desk administration, account owner and physiotherapist themselves will have access to the physiotherapy schedule.

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

E.g. Encryption standard for data in transit and data at rest; firewalls, strong passwords; MFA; encrypted documents, etc.

As per Jane App:

- Two-factor Authentication
- Federated ID Integration
- Biometric Support
- Encryption in-transit & at-rest
- Role-Based Access Control
- Penetration Tests
- Data Leakage Protection

5.3 Tracking Access / Access Controls. In this section, you will describe how the unit will minimize the risk of unauthorized access to Personal Information.

Health and Wellness Centre

5.3.1. FIPPA section 30 requires public bodies to manage access to PI based on the principle of “need to know” – that users may only access information that is necessary to do their job. This is frequently accomplished by assigning role-based access controls (RBAC), and by establishing a security matrix that describes which positions/roles are permitted to access specific types or groups of Personal Information. Access to personal information should only be permitted to those who demonstrate their right of access on the security access chart. **Please describe how access controls work in the department, or with this initiative.**

Account owner will have full access to the Jane app including chart records, managing staff permissions and access, and deletion/addition users.

Physiotherapist will have ability to make changes to patient chart, create/edit charting notes, add documents to chart, schedule patients.

Jane will continue to be used by counsellors, but access restrictions will be set that only counsellors can view counselling chart notes and only physiotherapists can view physiotherapist chart notes. In addition, only physiotherapist can see names of patients on their own schedule, and vice versa.

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

Clients (Students/employees) will only have the ability to update their contact information online and view their appointments, but they will be unable to view/edit charting notes.

5.3.2 How will you know if sensitive personal information is accessed, including access by service providers? This should include a description of what information is available through logs.

Activity log can be accessed by Account Owner and will list actions taken by each user – including chart access.

5.3.3 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.

Access to physiotherapist patient information and records is limited to front desk staff, account owner and physiotherapist - all of whom have training in regards to technical aspects of Jane. They are all given permission to update changes to personal information when necessary.

Health and Wellness Centre

5.4 What controls does the provider have in place to prevent unauthorized access to sensitive personal information?

Describe technical, administrative, and/or policy measures in place to protect PI. If using a cloud-based service provider, include a description of controls in each layer of the stack: software level, platform level, infrastructure level.

Only front desk administration, account owner (HWC Manager), and physiotherapist will have access to Jane App specific to physiotherapy services. Counsellors use Jane App, but there are levels of protection that stop them from viewing physiotherapist calendar and charting notes, and vice versa. All users of Jane have a personal user id and password required to sign on. When staff are away from computers, computers are locked. Access to VIU computer requires VIU user name and password.

Part 6: Accuracy/Correction/Retention of Personal Information

[FIPPA section 28 states](#) that a public body must make every reasonable effort to ensure that an individual's personal information is accurate and complete. In this section, you will demonstrate how you intend to keep personal information on file accurate and complete.

6.1 How is an individual's information updated or corrected?

[FIPPA section 29](#) states that a person can ask you to correct their personal information in your custody or control. If it is not possible to update or correct (for physical, procedural or other reasons) it must be noted on the record. **Please explain how it will be updated or annotated. If personal information will be disclosed to others, how will VIU 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 physiotherapist, front desk or account owner.
Only physiotherapist will have the ability to view and/or update chart notes

Health and Wellness Centre

6.2. Does your initiative use personal information to make decisions that directly affect an individual(s)?

Yes – physiotherapist uses information gathered including medical history, and appointment charting documentation to make decisions regarding a patient’s diagnoses, treatment and care plan

6.2.1. If you answered “yes” to question 6.2, do you have an information schedule in place related to personal information used to make a decision?

FIPPA requires that public bodies keep personal information for a minimum of one year after it is used to make a decision.

Information will be stored for 16 years as per College of Physical Therapists of BC Standards of Practice.

6.3. Do you have a records management schedule in place?

How long will you keep the personal information collected? Is there a plan in place for retention and deletion? Please also use this question to note how long it will be stored by the service provider (if applicable).

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. College of Physical Therapists of BC Standards of Practice requires that records be held for 16 years and 16 years past a minor’s 19th birthday.

Part 7 – Personal Information Banks

A personal information bank (PIB) is a collection of personal information searchable by name or unique identifier.

7.1. Will your initiative result in a personal information bank?

Click or tap here to enter text.



Privacy Impact Assessment for:

Health and Wellness Centre

If yes, please complete the table below:

Describe the type of information in the bank
Name of main organization involved
Any other ministries, agencies, public bodies or organizations involved
Business contact title and phone number for person responsible for managing the Personal Information Bank

Part 8 – Further Information

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

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

8.2. Will the information collected be used for research or statistical purposes?

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

Part 9 – Summary and Proponent Responsibility

This section is for Privacy Office recommendations as well as any limitations due to privacy concerns.

This initiative is approved for privacy with the following conditions:

-

s. 13(1)

***January 2026 update:

-

-

These updated recommendations support continuity of care, improve operational logistics, and align retention standards.

-

Part 10: Signatures

This PIA accurately documents the data elements and information flow at the time of signing. If there are any changes to the overall initiative, including to the way personal information is collected, used, stored or disclosed, the program area will engage with their Privacy Office and if necessary, complete a PIA update.

Reviewed by	Privacy Officer
Approved by	Manager, HWC
Date:	2025-Jan-24