

PRIVACY IMPACT ASSESSMENT

Initiative Update – HLTH21100 (2019-45K)

This document is used for a change to an initiative involving the collection, use, disclosure, security, storage, accuracy, correction, or retention of personal information where a PIA has already been completed. If a change does not involve one of these elements, then an updated PIA is not needed. If the change involves many of these elements, you may need to prepare a new PIA instead of using this document. If you have any questions, please call the Privacy and Access Helpline (250 356-1851) for a privacy advisor. Please see our [PIA Guidelines](#) for question-specific guidance on completing a PIA.

1. Title of original PIA and any number assigned to original PIA

HLTH19061 Health Gateway PIA



Adobe Acrobat
Document

HLTH19056 Health Gateway BCSC PIA Checklist



Adobe Acrobat
Document

2. Ministry/Public Body and Program Area.

Ministry	Ministry of Health
Division	Health Sector IM/IT Division
Branch/Section	Digital Health Strategic Initiatives
Initiative Title	Health Gateway

3. Contact Position and/or Name, Telephone Number and E-Mail Address.

Name, Title	Nino Samson, Product Owner
Branch/Section	Health IT Strategy, Strategic Planning
Phone Number	778-974-2712
E-Mail	Nino.samson@gov.bc.ca

4. Common or Integrated Program and Data-Linking Initiatives

		Yes	No
(a)	Does the original PIA (or the change now being considered) involve a “common or integrated program/activity”, as defined in Schedule 1 of the <i>Freedom of Information and Protection of Privacy Act</i> (FOIPP Act)? * *Note: a “common or integrated program/activity” must be confirmed by regulation		x
(b)	Does the original PIA (or the change now being considered) involve a “data-linking initiative”, as defined in Schedule 1 of the FOIPP Act?		x

5. Description of the revision.

The Health Gateway provides citizens with access to their health records from provincial information systems, including COVID-19 vaccine records. To support citizens in providing proof of vaccination for non-essential services as mandated by the province of BC starting September 13, 2021, Health Gateway will provide a vaccine card which displays the citizen’s COVID vaccination status and a QR which can be scanned by businesses to validate the status presented.

The BC Vaccine Card can be accessed three ways:

1. By logging into the Health Gateway using the BC Services Card mobile app.
2. Through Service BC via the Get Vaccinated line or in-person and confirming their identity. Service BC will either mailout a copy of the vaccine card (along with the COVID vaccine record) or print the card for the citizen.
3. Online through a new Health Gateway page. The citizen must provide their Personal Health Number (PHN), Date of Birth (DOB) and the date of one of their COVID vaccines to get their vaccine card. The citizen will have the option to print the PDF of their vaccine card, or they can take a screenshot and save it to their phone.

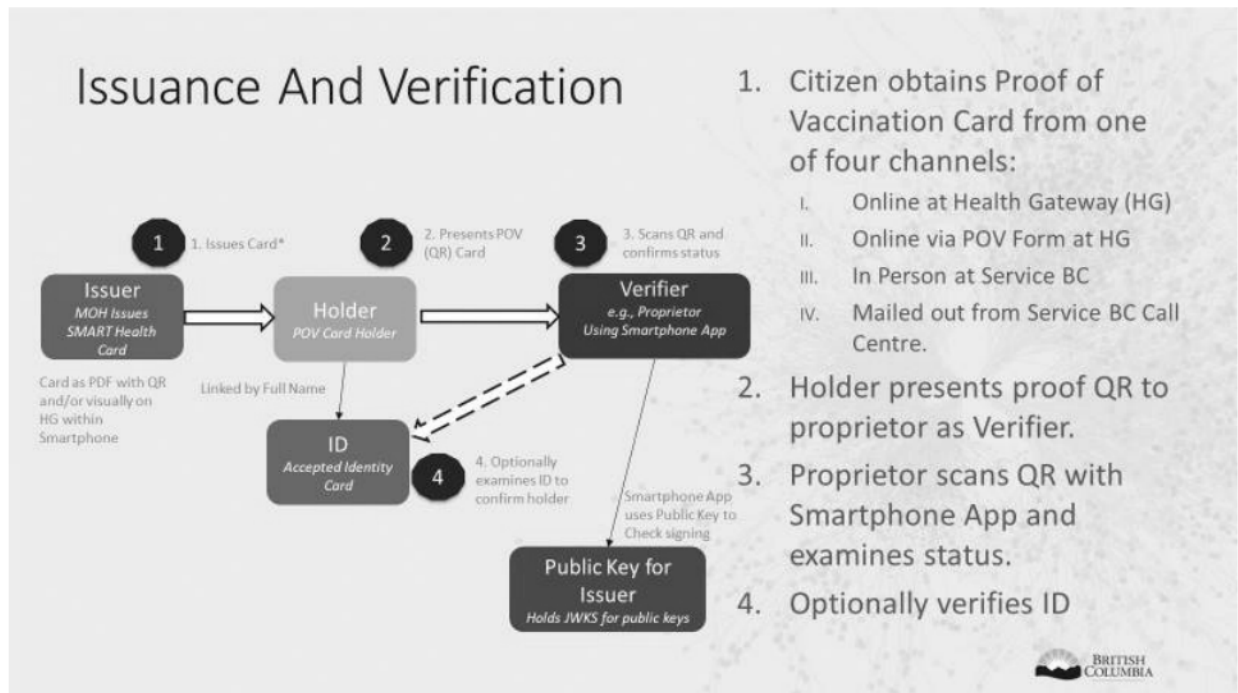
The vaccine card will have the following elements:

- Full Name
- Indication of their vaccination status. The rules to determine status may change, but for this implementation, they are as follows.
 - Vaccinated: Two COVID doses and 7 days after the second dose.
 - Partially Vaccinated: One dose or two doses and less than 7 days after the second dose.
 - No records found
- QR Code with vaccine information, following the SMART Health Card specification.
 - The QR will contain the citizen’s name, date of birth, date of vaccination, vaccine type, lot #, and clinic where the vaccine was received. This information has been included to align with the federal standard and to enable the use of

this service for other use cases such as travel. Only the citizen's name and vaccine status will appear when the QR code is scanned with the BC Vaccine Verification App.

- The QR can be scanned by the BC Vaccine Checker app. See PIA 2021-76/HLTH21101 for privacy related to the app.

Citizens will be able to access their BC Vaccine Card on September 7, 2021, in preparation for the September 13, 2021 enforcement date.



In order for the vaccine card to generate a citizen's name as is listed on their BC Services Card, data will be pulled from the ImmsBC Enterprise Master Patient Index (EMPI) cache. There will be a daily load of updated EMPI data (aka. delta updates) into the cache to ensure data is accurate and up to date. Data that will be cached includes:

- PHN
- Date of Birth
- legal documented first given name
- legal documented second given name
- legal documented third given name
- legal documented surname
- first given name
- second given name
- third given name
- surname
- Deceased status*

* Deceased status is required to mark individuals as deceased in ImmsBC and to prevent the potential printing of deceased individual's Vaccine Card.

This is a change to how the system was originally set up, which was to pull information from the Provincial Immunization Record (PIR). PIR may not be in sync with EMPI data and therefore, the vaccine card is displaying name information that does not align with the BC Services Card.

Delta updates are being changed from weekly to daily to reduce wait times of name changes.

Vaccine status will still be pulled from PIR.

Change	Brief Description	FOIPP Authority / Rationale in Brief
collection of personal information	The following information will be collected in the new BC Vaccine Card form to validate the citizen: • PHN • DOB • Vaccine Date *This information will not be stored. No change to collection of personal information for Health Gateway users or Service BC collection. Activities Service BC will be involved in when pulling records from Health Gateway have been assessed in HLTH21093. Personal information is collected by BC Mail in order for physical cards to be printed and mailed.	26 (a) and (c) as per the Order of the Provincial Health Officer [made under s. 30, 31, 32 of the Public Health Act] 26(c) 27(1)(b) 27(1)(e)
use of personal information	The citizen's demographic and vaccine date information will be used to provide assurance of the citizen's identity. The citizen's personal and health information will be used to create the QR code. Data from EMPI will be sent to the ImmsBC EMPI cache daily To Summarize the SBC process: SBC will login with their IDIRs. They have their own portal which they can log into. They enter the PHN and confirm the Enterprise Master Patient Index (including address) and immunization record information. They can then select print or mail. Printing will save locally to the workstation so the SBC agent can provide it to the citizen in person. Their process is to delete afterwards.	32(a) Designation Order M109-2020

	Mail will drop a file through a secure file transfer server to BC Mail for mailout.	
disclosure of personal information	The citizen will disclose their vaccine status and scannable QR code to non-essential businesses to prove vaccination status. Only the citizen's name and vaccine status will be provided. Businesses have the option of scanning the QR code for further validation, however, they are not required to and may accept a screenshot/printout of the vaccine card along with a piece of acceptable identification as outlined in the PHO. MoH discloses a citizens' personal information to that citizen Card data is disclosed to BC Mail in order to be printed and mailed via Canada Post.	33.1 (1)(c) as per the Order of the Provincial Health Officer [made under s. 30, 31, 32 of the Public Health Act] 33.1(7), 33.2(a) 33.2(a), 33.2(c), 33.2(d)
security of personal information	The security of the personal information is referenced in STRA amendment #S2021-55	N/A
storage of personal information	No change.	N/A
accuracy or correction of personal information	No change.	N/A
retention of personal information	No change.	N/A

6. Purpose/Objectives of the revision (if statutory, provide citation).

This revision addresses the provincial mandate for providing proof of vaccination when engaging in non-essential services, effective September 13, 2021. To ensure access for all citizens who have received vaccinations in BC, the vaccine card will be available through the Health Gateway portal, Service BC, and through the new online service. These channels will all provide the vaccine card and

QR code, with additional COVID vaccine record information available through the Health Gateway and Service BC given stronger identity assurance processes.

Conformance with the SMART Health Card specification allows for BC to be closely aligned with the emerging federal vaccine passport requirements and for potential interoperability with other provinces and territories for provincial vaccine cards.

6. What are the potential impacts of this proposal?

As the vaccine card will be presented to a number of businesses, personal information is minimized and only the name and status (vaccinated, partially vaccinated, no records) is disclosed. The QR code will have the vaccine information (product, date, lot), however, the BC Vaccine Checker app that businesses use to validate the card will not display this information.

To mitigate fraudulent access of the vaccine card, the following measures are in place, as listed below for each channel:

- Health Gateway – requires BC Services Card mobile app to login. This includes video/in-person identity proofing and two-factor authentication.
- Service BC – 5-point validation and delivery by mail-out or in-person.
- BC Vaccine Card online access – validation of PHN, DOB and date of vaccination. Additional security measures include:
 - locks on PHN after 5 failed attempts to access card
 - bot protection using Akamai (solution to provide a wait room for peak volumes). Akamai was assessed as compliant by the Provincial Health Services Authority PIA #2021-0098.
- Sufficient public messaging about what is embedded in the QR code; advisements not to post pictures of the QR code or post to social media, keeping it safe from being taken/stolen etc.

Risk	Response/Mitigation
1. Data elements needed to issue a card/QR code are accessible to others (e.g., an employer) therefore vaccine status may be obtained by someone else other than the individual and an employer could potentially check up on their employee's vaccine status without their knowledge.	There is nothing stopping an individual that already has a citizen's personal information from generating a card for that citizen; however, when scanned with the app, only the name and vaccine status will be visible, and ID should be checked to ensure the name on the card matches the ID shown. In other words, if a person is able to access the person's vaccine status, they had to have the details of the person's vaccination status to access the information in the first place. The PHO does not mandate an employer to check their employee's status and if done so without that employee's knowledge, this would constitute a reportable privacy breach.

2. Businesses do not use the BC Vaccine Card Verifier App; third-party scanning apps may be used to display more information than needed to the establishment	Businesses will be told that they are not to do this as per the Public Health Order – and there are fines for breaking the PHO. It will not be made public that there are other apps that can read our QR codes. Minimal personal information is stored in the QR code, thus minimizing risk to individuals if this were to occur.
3. Businesses could store/retain an individual's QR code/information obtained from their QR code when not authorized to do so	Businesses will be told that they are not to do this as per the Public Health Order – and there are fines for breaking the PHO.

PCT Comments and Signatures

This PIA is based on a review of the material provided to PCT as of the date below. If, in future any substantive changes are made to the scope of this PIA, the ministry will have to complete a PIA Update and submit it to PCT.

PCT has reviewed the ministry's PIA outlining the activities associated with issuing Vaccine QR codes/cards to citizens who wish to obtain proof of their vaccination status. Per the PHO's Orders regarding high-risk public activities, citizens wanting to participate are required to provide proof of COVID-19 vaccination via a digital QR code or physical card. This PIA indicates 3 options citizens have to obtain their QR code/card; through Health Gateway via BC Services Card authentication, in-person or by telephone at Service BC, or through a separate access page to Health Gateway without BC Services Card authentication. Appropriate collection, use, and disclosure authorities have been indicated for each activity. The OIPC was consulted on this file which raised some inquiries regarding clarification of the PHO's Orders, data flows, and risk mitigation strategies. All concerns have now been addressed appropriately.

Jessica Bouchard

Privacy Advisor
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Citizens' Services



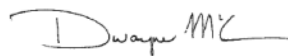
Signature

September 23, 2021

Date

Dwayne McCowan

Manager, Privacy Operations
Privacy, Compliance and Training
Branch
Corporate Information and Records
Management Office
Ministry of Citizens' Services



Signature

September 23, 2021

Date

X SIGNATURES

PUBLIC BODY APPROVAL:

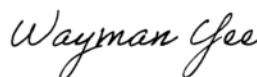
Pamela Smith
Program Manager



Signature

October 3, 2021
Date

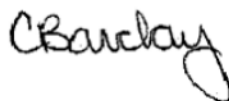
Wayman Yee (A-MISO)
Ministry Contact Responsible for
Systems Maintenance and Security
[for changes to security, an upgrade to
an existing system or change from face-
to-face to online services]



Signature

October 4, 2021
Date

Corrie Barclay



Assistant Deputy Minister or Equivalent

Signature

October 13, 2021

Date

GO TO: PERSONAL INFORMATION DIRECTORY (to add PIA and/or ISA summary)