



Privacy Incident Reporting Process

Purpose of this Process

This process outlines the steps Community Housing Providers and Housing Services must follow when responding to a suspected or confirmed privacy incident involving personal information. It is intended to ensure a consistent, timely, and coordinated approach to reporting, assessing, and managing privacy incidents in accordance with applicable privacy legislation and Regional requirements.

This process clarifies roles and responsibilities between Community Housing Providers, Housing Services, and the Region's Access and Privacy Office, and supports appropriate escalation, documentation, and decision-making regarding whether an incident constitutes a privacy breach and whether notification to affected individuals or the Information and Privacy Commissioner of Ontario is required.

Immediate Action by Community Housing Provider

If a privacy incident is suspected or confirmed, the Community Housing Provider must:

- Immediately take steps to contain the incident, including:
 - Preventing further unauthorized access, use, or disclosure
 - Securing an affected records or systems
- Notify Housing Services as soon as possible, and no later than 72 hours after becoming aware of the incident.

Initial Notification to Housing Services

- The Community Housing Provider reports the incident to Housing Services as the first point of contact.
- Notification may be based on a suspected or confirmed incident (confirmation is not required at this stage).

Preliminary Review by Housing Services

- Housing Services will:
 - Review the information provided
 - Determine whether a privacy incident may have occurred
- If a privacy incident is identified or reasonably suspected:
 - Housing Services will provide the Community Housing Provider with a Privacy Incident Report form.



Privacy Incident Reporting Process

Completion of Privacy Incident Report

The Community Housing Provider must:

- Complete the Privacy Incident Report form
- Provide all known details, including:
 - Description of the incident
 - Type of personal information involved
 - Number of individuals affected (if known)
 - Steps take to contain incident
- Submit the completed report to Housing Services

Review with Access and Privacy Office

Upon receipt of the completed report:

- Housing Services will liaise with the Region's Access and Privacy Office
- Additional information may be requested from the Community Housing Provider as needed

The Access and Privacy Office will:

- Asses the incident
- Determine whether it constitutes a privacy breach
- Evaluate the level of risk and potential harm

Determination and Notification Requirements

Based on the assessment:

- A determination will be made regarding whether:
 - The incident is a privacy breach, and
 - Notification is required to:
 - The Information and Privacy Commissioner of Ontario (IPC), and/or
 - Affected individual(s)
- Housing Services will coordinate next steps in consultation with the Access and Privacy Office.



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Ongoing Cooperation

Community Housing Providers must:

- Fully cooperate with Housing Services and the Access and Privacy Office
- Provide any additional records, clarification, or documentation required
- Participate in any follow-up or mitigation measures

All privacy incidents must be reported and assessed, even if they are suspected only. Final determination of whether an incident is a reportable privacy breach rests with the Region's Access and Privacy Office.