Privacy Incident Report

Social Services Department
Housing Services Division

Section 1: Your Information *(Housing Provider completing the form)*

First name*	
Last name*	
Job title*	
Department*	
Telephone*	
Email*	

Section 2: Person who reported the Privacy Incident to you

First name*	
Last name*	
Job title*	
Department*	
Telephone*	
Email*	

Section 3: Incident Details

Date incident occurred	
Time incident occurred	
Date incident discovered*	
Time incident discovered	
Date incident reported to you*	
Time incident reported to you	
Type of incident*	
Type of compromised information*	
Number of individuals affected*	

Section 4: Description of the Privacy Incident

Please describe the circumstances of the incident, including what happened, how Personal Information (PI) or Personal Health Information (PHI) as applicable came to be stolen or lost or used or disclosed without authority, how the incident was discovered and whether other organizations were involved.

Section 5: Action Plan

Containment

Please describe the steps that have been taken to contain the privacy incident, the date that such steps were taken, and the outcome of these steps – including whether these steps were successful in containing the privacy incident.

Notification

Steps taken to notify affected individuals

***Attach notification letters if applicable**

Signature	
Date	

Section 6: Access and Privacy Office Review

(Completed by Privacy Analyst and reviewed by Privacy Officer)

INVESTIGATION

Identify and analyze the events that led to the incident
Determine the source of the incident (internal or external) and its root cause
Determine key facts in relation to the incident and its impact on the Region

Determine if the incident was an isolated incident or a systemic issue
Examine the adequacy of the security measures
Examine the adequacy of the organizational privacy policies and/or procedures and the adequacy of staff training
Investigate if the information was stolen and/or if the information is at risk to being further disclosed as a result of the initial incident.
What are the contributing factors that led to the incident?

REMEDIATION

What steps have been taken to remediate and prevent a future incident?
What steps remain to be taken to remediate and prevent a future incident?

Section 7: Reporting Obligations under MFIPPA and PHIPA

MFIPPA: has not been amended to include the same breach requirements under FIPPA. However, the IPC has advised that MFIPPA institutions should proactively adopt these new obligations. As such, privacy breaches reported under MFIPPA must be reviewed to determine if a privacy breach creates a real risk of significant harm. The guidance can be found here: Privacy Breaches: Guidelines for Public Sector Organizations | Information and Privacy Commissioner of Ontario

PHIPA: Under our obligations under PHIPA, we must notify the IPC at the first reasonable opportunity of the breach falls under one of the seven categories described here: Report a health privacy breach | Information and Privacy Commissioner of Ontario

Section 8: Acknowledgement

Privacy Analyst

Signature	
Date	

Privacy Officer

Signature	
Date	