

Procedure Number:	6751p
Procedure Title:	Privacy Breach Response
Approved by:	Senate
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Effective date:	September 21, 2011
Review date:	June 2024
Next review date:	June 2026

1. Purpose

- 1.1. This Procedure is designed to support Policy 6751.
- 1.2. This Procedure outlines the steps, responsibilities, and timelines for responding to Privacy Breaches.

2. Definitions

- 2.1. The definitions in Policy 6751 apply to this Procedure.

3. Discovery and Notification of the Privacy Breach

- 3.1. *Responsibility*: Discoverer of the Privacy Breach must notify the employee with the responsibility.
- 3.2. *Timeline*: Immediate upon the breach discovery.

4. Internal Reporting of the Privacy Breach

- 4.1. *Responsibility*: Employee with the direct responsibility for the Privacy Breach must notify the following:
 - 4.1.1. Employee's manager; and
 - 4.1.2. Privacy and Data Protection Officer at privacy@ucanwest.ca.
- 4.2. *Timeline*: Same day as the breach discovery.
- 4.3. If the employee's manager and the Privacy Data Protection Officer are unavailable, then the employee may seek assistance from the IT department as necessary to contain the Privacy Breach.

5. Preserve the Evidence

- 5.1. *Responsibility*: Privacy and Data Protection Officer.
- 5.2. *Timeline*: Same day as the breach discovery.

6. Contain the Privacy Breach

6.1. *Responsibility:* Privacy and Data Protection Officer.

6.2. *Timeline:* Within two days of the breach discovery.

7. Evaluate the Risks

7.1. *Responsibility:* Privacy and Data Protection Officer.

7.2. *Timeline:* Within two days of the breach discovery.

8. Designate a Breach Response Team as Appropriate

8.1. *Responsibility:* Privacy and Data Protection Officer.

8.2. *Timeline:* Within two days of the breach discovery.

9. Notify Affected Individuals as Appropriate

9.1. *Responsibility:* Privacy and Data Protection Officer.

9.2. *Timeline:* Within three days of the breach discovery.

10. Notify the BC Privacy Commissioner as Appropriate

10.1. *Responsibility:* Privacy and Data Protection Officer (in consultation with the Executive Team).

10.2. *Timeline:* Within one week of the breach discovery.

11. Contact Police as Appropriate

11.1. *Responsibility:* Privacy and Data Protection Officer (in consultation with the Executive Team).

11.2. *Timeline:* Within one week of the breach discovery.

12. Contact Others as Appropriate

12.1. *Responsibility:* Privacy and Data Protection Officer.

12.2. *Timeline:* As appropriate.

13. Conduct Further Investigation If Necessary

13.1. *Responsibility:* Privacy and Data Protection Officer, security officer, external auditor, or investigator.

13.2. *Timeline:* Within 2-3 weeks of the breach discovery.

14. Review Investigative Findings and Develop Prevention Strategies

14.1. *Responsibility:* Privacy and Data Protection Officer and program area manager.

14.2. *Timeline:* Within one month of the breach discovery.

15. Implement Prevention Strategies

15.1. *Responsibility:* Privacy and Data Protection Officer and program area manager.

15.2. *Timeline:* Depending on approach selected.

16. Monitor Prevention Strategies

16.1. *Responsibility:* Privacy and Data Protection Officer and program area manager.

16.2. *Timeline:* Regular privacy audits.

17. Related Policies

Policy Number	Policy Title
1506	Survey
2700	Acceptable Use of Information Technology Resources
6750	Records Management
N/A	Website Privacy Policy