

Procedure Number:	6751p
Procedure Title:	Privacy Breach Response
Approved by:	Academic Council
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Next review date:	November 2023

1. Purpose

1. This Procedure outlines the steps, the responsibilities and timelines for responding to privacy breaches at University Canada West.

2. Contain the breach

2.1. *Responsibility:* Program area where breach occurred (employee that has direct responsibility and/or manager).

2.2. *Timeline:* same day as breach discovered

3. Report the breach within the organization

3.1. *Responsibility:* the following individuals are notified as soon as feasible possible, in sequence:

3.1.1. Program area staff (report to management)

3.1.2. Management

3.1.3. Privacy Officer

3.2. *Timeline:* same day as breach discovered

4. Designate lead investigator and select breach response team as appropriate

4.1. *Responsibility:* Privacy Officer

4.2. *Timeline:* same day as breach discovered

5. Preserve the evidence

5.1. *Responsibility:* Privacy Officer

5.2. *Timeline:* same day as breach discovered

6. Contact police if necessary

6.1. *Responsibility:* Privacy Officer (in consultation with Executive Council)

6.2. *Timeline:* Within 2 days of breach discovery

7. Conduct preliminary analysis of risks and cause of breach

7.1. *Responsibility:* Lead Investigator

7.2. *Timeline:* Within 2 days of breach discovery

8. Determine if the breach should be reported to the BC Privacy Commissioner

8.1. *Responsibility:* Privacy Officer (in consultation with Executive Council)

8.2. *Timeline:* Generally, within 2 days of breach discovery

9. Take further containment steps if required based on preliminary assessment

9.1. *Responsibility:* Lead Investigator or Privacy Officer

9.2. *Timeline:* Within 2 days of breach discovery

10. Evaluate risks associated with breach

10.1. *Responsibility:* Lead Investigator or Privacy Officer

10.2. *Timeline:* Within 1 week of breach

11. Determine if notification of affected individuals is required

11.1. *Responsibility:* Privacy Officer

11.2. *Timeline:* Within 1 week of breach

12. Notify affected individuals

12.1. *Responsibility:* Privacy Officer or program area manager

12.2. *Timeline:* Within 1 week of breach

13. Contact others as appropriate

13.1. *Responsibility:* Privacy Officer or program area manager

13.2. *Timeline:* As appropriate

14. Determine if further in-depth investigation is required

14.1. *Responsibility:* Privacy Officer or program area manager

14.2. *Timeline:* Within 2-3 weeks of breach

15. Conduct further investigation into cause & extent of the breach if necessary

15.1. *Responsibility:* Privacy Officer, security officer or outside independent auditor or investigator

15.2. *Timeline:* Within 2-3 weeks of breach

16. Review investigative findings and develop prevention strategies

16.1. *Responsibility:* Privacy Officer or program area manager

16.2. *Timeline:* Within 2 months of breach

17. Implement prevention strategies

17.1. *Responsibility:* Privacy Officer or program area manager

17.2. *Timeline:* Depending on approach selected

17. Monitor prevention strategies

17.1. *Responsibility:* Privacy Officer or program area manager

17.2. *Timeline:* Annual privacy/security audits