AP 8040-F2 Privacy Breach Report

Interlake School Division · 192 2nd Ave. N, Stonewall, MB R0C 2Z0 · 204-467-5100

CONFIDENTIAL. Complete Part 1 the same day the breach is discovered and send it to the Access and Privacy Officer. Do not include more personal information on this form than needed to describe the breach. Use initials or file numbers, not full names or health details. Parts 2–5 are completed by the Access and Privacy Officer. See AP 8040, Section C.

Part 1 – Initial report (person reporting)

Field	Response
Name and position of person reporting	
School / department	
Phone and email	
Date and time breach occurred (if known)	
Date and time breach discovered	
Date and time reported to Principal/supervisor	
Principal/supervisor notified (name)	
Location of breach (site, system or application)	

Type of breach (check all that apply)

☐ Misdirected email, fax or mail
☐ Lost or stolen device (laptop, phone, tablet, USB drive)
☐ Lost or stolen paper records
☐ Access to records without a need to know
☐ Disclosure to an unauthorized person (verbal or written)
☐ Cyber incident or unauthorized system access
☐ Vendor / information manager incident
☐ Improper disposal of records
☐ Other: _____

Whose information was involved? (check all that apply)

☐ Students · approximate number: _____
☐ Employees · approximate number: _____
☐ Parents/guardians or other individuals · approximate number: _____

What information was involved? (check all that apply)

☐ Name, address or contact information
☐ Date of birth, PHIN, SIN or other identifying number
☐ Health information (medical notes, diagnoses, medications, health care plans)
☐ Pupil support file or clinician reports
☐ Employee HR, disciplinary or evaluation information
☐ Financial or banking information
☐ Child protection, safety or legal information
☐ Other: _____

Description of what happened (who, what, when, how; attach pages if needed):

Immediate steps already taken to contain the breach:

Signature of person reporting: _____ Date: _____

Part 2 – Containment

Containment step	Done	Date	By
Information retrieved, recalled or deleted	☐		
Recipient confirmed in writing that information was returned/destroyed and no copies kept	☐		
Accounts, passwords or access rights suspended or changed	☐		
Technology Department notified (electronic breaches)	☐		
Vendor / information manager notified	☐		
Physical location secured	☐		
Police notified (theft or criminal activity)	☐		

Is the breach fully contained? ☐ Yes ☐ No. If no, explain: _____

Part 3 – Risk of harm assessment (Access and Privacy Officer)

Assess the factors in PHI Regulation s. 8.7 and the FIPPA Regulation.

Factor	Assessment	Notes
Sensitivity of the information	☐ Low ☐ Moderate ☐ High	
Probability of misuse (who received it, intent, recovered, encrypted)	☐ Low ☐ Moderate ☐ High	
Number of individuals affected		
Possible harms (bodily harm, humiliation, reputation or relationships, loss of employment, financial loss, identity theft)		
Other relevant factors		

Determination: Could the breach reasonably be expected to create a real risk of significant harm to any individual?

☐ Yes – notification required (complete Part 4) ☐ No – notification not required. Reasons:

Assessed by: _____ Date: _____

Part 4 – Notification

Notification	Required	Date sent	Method	By
Affected individuals (or parents/guardians)	☐		☐ Letter ☐ In person ☐ Phone + written	
Manitoba Ombudsman (Privacy Breach Reporting Form)	☐			
Superintendent/CEO	☐			
Insurer	☐			
Manitoba Education	☐			
Union / association	☐			
Other:	☐			

If any affected individual was notified indirectly, state the reason permitted by the Regulation:

Notice included: ☐ what happened and when ☐ information involved ☐ steps taken ☐ steps the individual can take ☐ Division contact ☐ right to complain to the Ombudsman

Part 5 – Cause and corrective action

Root cause: ☐ Human error ☐ Lack of training ☐ Procedure gap ☐ Technical failure ☐ Intentional act ☐ Vendor ☐ Other: _____

Corrective action	Responsible	Target date	Completed
			☐
			☐
			☐

Referred for review under AP 8160 Staff Conduct and Discipline? ☐ Yes ☐ No

Entered in Privacy Breach Log: ☐ Yes · Log number: _____

Access and Privacy Officer signature: _____ Date file closed: _____

Retain this form in the confidential privacy breach file in accordance with AP 3160. Do not place in any student or personnel file.