



**RICHMOND
CHRISTIAN
SCHOOL**

EST. 1957

POLICY NUMBER AND NAME: 01.08 CRITICAL INCIDENT AND PRIVACY BREACH RESPONSE POLICY – VERSION 1.0	RESPONSIBILITY	BOARD	SUPERINTENDENT	SLT
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SECTION: 01 – CONSTITUTION AND BYLAWS	LAST REVISION DATE:			
ADOPTED: SEPTEMBER 28, 2026	REVIEW FREQUENCY: EVERY 3 YEARS			

PREAMBLE

The purpose of this Critical Incident and Privacy Breach Response Policy (the “Policy”) is to set out the School’s process for responding to significant privacy breaches and to providing appropriate notices and reports of incidents that occur in accordance with applicable privacy legislation. All Staff will follow the School’s procedures for all actual, suspected, or expected Privacy Breach incidents

RATIONALE

The School is committed to ensuring the protection and security of all Personal Information within its control. That commitment includes responding effectively and efficiently to Privacy Breach incidents that may occur. Managing privacy breaches properly is a crucial step towards alleviating harms – and preventing future breaches of personal information.

SCOPE

The administration of this Policy is the responsibility of the School Principal and the Privacy Officer (if the Principal is not the Privacy Officer). The Principal may delegate any of their powers under this Policy to other school employees. Where there has been a breach in privacy the Principal will inform the Authority/Board and address the privacy breach.

This policy applies to all employees, contractors, volunteers and persons authorized to access student records when planning for, or delivering, health services, social services or other support services to a student (“Staff”). All Staff are expected to be aware of and follow this Policy in the event of a Privacy Breach.

REVIEW HISTORY		
DATE	VERSION	CHANGES

1. DEFINITIONS:

- a. ***Personal Information*** - means any recorded information about an identifiable individual that is within the control of the School, and includes information about any student, parent, employee, or volunteer of the School, inclusive of or any other party the School does business with. Personal Information does not include publicly available business contact information, such as email address and telephone number, that would allow a person to be contacted at work.
- b. ***Privacy Breach*** - means the theft or loss of or the collection, use or disclosure of Personal Information not authorized by the BC Personal Information Protection Act (PIPA), and includes cyber and ransomware attacks and other situations where there are reasonable grounds to believe that any such unauthorized activities have taken place or there is a reasonable belief that they will take place.
- c. ***Records*** - includes books, documents, maps, drawings, photographs, letters, vouchers, papers, and any other thing on which information is recorded or stored by graphic, electronic, mechanical or other means, but does not include a computer program or other mechanism that produces records.

2. PROCEDURES:

The Principal will ensure that all employees, contractors, and volunteers are made aware of this policy.

- a. ***Responsibilities of Employees, Contractors, and Volunteers (Staff)***
 - i. All Staff must without delay report all actual, suspected, or expected Privacy Breach incidents of which they become aware in accordance with this Policy to the School's Privacy Officer.
 - ii. If there is any question about whether an incident constitutes a Privacy Breach or whether a Privacy Breach incident has occurred, the person is to consult with the Privacy Officer.
 - iii. All Staff must provide their full cooperation in any investigation or response to a Privacy Breach incident and comply with this Policy for responding to Privacy Breach incidents.
 - iv. Any Staff who knowingly refuses or neglects to report a Privacy Breach in accordance with this Policy may be subject to discipline, up to and including dismissal of employment or termination of contract or services, as applicable.
- b. ***Privacy Breach Response***
 - i. **Step One** – Report Within the School and Contain

- 1) All employees, contractors, and volunteers, upon discovering or learning of a Privacy Breach, will immediately report the Privacy Breach to the Principal (and the Privacy Officer if the Privacy Officer is not the Principal); and the employees, contractors, and volunteers will:
 - a) take any immediately available actions to stop or contain the Privacy Breach, such as:
 - i) isolating or suspending the activity that led to the Privacy Breach; and
 - ii) taking steps to recover personal information, records, or affected equipment; and
 - b) preserve any information or evidence related to the Privacy Breach in order to support the School's incident response.
- 2) Upon being notified of a Privacy Breach by an employee, contractor, and/or volunteer, the Principal/Privacy Officer, in consultation with other senior leadership team members, will implement all available measures to stop or contain the Privacy Breach. Containing the Privacy Breach will be the first priority of the Privacy Breach response, and all employees are expected to provide their full cooperation with such initiatives.
- 3) Law enforcement may need to be contacted by the Principal/Privacy Officer if necessary, and where law enforcement may be able to reduce the risk of harm that could result from the Privacy Breach, or when suspected or actual criminal activity such as theft has taken place.
- 4) Upon being notified of a Privacy Breach the Principal will inform the chair of the Authority/Board.

ii. **Step Two** – Assessment and Containment

- 1) The Principal/Privacy Officer will take steps, in consultation with other senior leadership team members, to investigate and contain the Privacy Breach by making the following assessments:
 - a) the cause of the Privacy Breach;
 - b) if additional steps are required to contain the Privacy Breach, and, if so, to implement such steps as necessary;
 - c) identify the type and sensitivity of the Personal Information involved in the Privacy Breach, and any steps that have been taken or can be taken to minimize the harm arising from the Privacy Breach;
 - d) identify the individuals affected by the Privacy Breach, or whose Personal Information may have been involved in the Privacy Breach;

- e) determine or estimate the number of affected individuals and compile a list of such individuals, if possible; and
 - f) make preliminary assessments of the types of harm that may flow from the Privacy Breach.
- 2) The Principal/Privacy Officer will be responsible to, without delay, assess whether the Privacy Breach could reasonably be expected to result in significant harm to individuals (“Significant Harm”). That determination will be made with consideration of the following categories of harm or potential harm:
- a) bodily harm;
 - b) humiliation;
 - c) damage to reputation or relationships;
 - d) loss of employment, business, or professional opportunities;
 - e) financial loss;
 - f) negative impact on credit records;
 - g) damage to, or loss of, property;
 - h) the sensitivity of the Personal Information involved in the Privacy Breach (for example, medical records and income records are almost always considered to be sensitive but any information can be sensitive depending on the context);
 - i) the probability that the Personal Information has been/is/will be misused; and
 - j) the risk of identity theft.

iii. **Step Three** – Notification

- 1) Decisions about notification will be made by the Principal and the Authority/Board, in consultation with legal counsel if necessary.
- 2) When there is a serious privacy breach the Principal will report the breach to the Office of the Information & Privacy Commissioner for BC. (NOTE: Under the PIPA it is optional for the School to report to the Privacy Commissioner of BC).
- 3) Notification to affected Individuals may take place in the event that there is a risk of “significant harm” to affected individuals where required by law or where the School determines it is otherwise appropriate to do so. In such cases, the Principal or their designate will take steps to:
 - a) provide notice of the Privacy Breach to the affected individuals; and

- b) provide notice to third party organizations where such notification is required by way of contract, regulation, or legislation.
- 4) In determining whether notice should be provided to affected individuals the Principal and Authority/Board will consider whether the issuance of the notice itself will result in grave or immediate harm to an individual's safety or physical or mental health or threaten another individual's safety or physical or mental health.
- 5) Determinations about notification of a Privacy Breach will be made without delay following the Privacy Breach, and notification will be undertaken as soon as reasonably possible. If any law enforcement agencies are involved in the Privacy Breach incident, then notification may also be undertaken in consultation with such agencies.

iv. **Step Four** – Prevention

The Principal/Privacy Officer, in consultation with the senior leadership team, will complete an investigation into the causes of each Breach Incident reported under this Policy, and will implement measures to prevent recurrences of similar incidents.

v. **Step 5** – Recording and Retention

- 1) The Principal/Privacy Officer will ensure that a record of each Privacy Breach is created.
- 2) The Principal/Privacy Officer will ensure that all records with respect to all Privacy Breach incidents are kept for at least two years, unless other legal, business, or contractual requirements apply which would require the School to retain such records for longer.

c. ***Questions/ Concerns/Complaints and Contact Information***

- i. Questions or comments about this Policy may be addressed to the School's Privacy Officer.
- ii. Questions, concerns and complaints about privacy, confidentiality, and the School's practices in regard to the handling of personal information at the School should be directed to the School's Privacy Officer, who has been appointed by the Authority/Board. An individual with a question, concern and/or complaint should contact the Privacy Office by phone and/or email at the School. The Privacy Officer may ask the individual to put their question, concern, and/or complaint in writing.
- iii. The Privacy Officer will address such questions, concerns, and complaints in a timely manner.

d. *Changes To This Policy*

The School reserves the right to make changes to this Policy at any time. Such changes will be effective when posted. Employees, contractors, and volunteers are expected to review this Policy from time to time, or when instructed by the Principal, to become aware of any changes that have been made.

REFERENCE(S):

- [*Personal Information Protection Act*](#) (PIPA)
- [*A Guide to B.C.'s Personal Information Protection Act for Businesses and Organizations*](#)

CROSS-REFERENCE(S): (add or omit based on school's policies)

- [04.17 Personal Information And Privacy Policy For Students And Parents Guardians](#)
- [08.26 Personal Information And Privacy Policy For Employees And Volunteers](#)
- [08.26.01 Employee Expectations In Regard To Protecting Other's Personal Information And Privacy](#)
- [04.16 Student Records](#)
- [04.09 Guidance And Counselling Policy](#)