**Scenarios library**
[draft tool 7 in the privacy management and data sharing (PMDS, or privacy) toolkit]
[more scenarios to be added soon]
(Last updated 3 November 2026)

## Privacy breach

One of the key procedures in an effective privacy management and data sharing (PMDS) program is establishing a privacy breach response protocol. The IPC privacy-management handbook for small healthcare organizations suggests steps to follow in the event of a privacy breach (IPC handbook pages 36-39) and provides a sample breach notification (IPC handbook pages 51-53). The IPC also provides guidance on responding to a privacy breach, and IPC cases of note related to each of breaches, cyberattacks and ransomware.

We encourage you to read the **IPC Case of Note related to a privacy breach**, which provides a helpful summary of mechanisms to mitigate from the IPC's lens: https://www.ipc.on.ca/en/cases-of-note/preventing-health-privacy-breaches.

## Third-party technology service providers and shared systems

One of the key governance and accountability steps in an effective PMDS program is ensuring your agreements with service (e.g., EMR) providers adhere to PHIPA requirements (e.g., by ensuring an EMR is certified by OntarioMD or a virtual-visit solution is verified by Ontario Health). A key procedure in an effective PMDS is to implement (and regularly review) security controls, including technical safeguards (e.g., use only practice/organization-approved email, messaging and videoconference accounts; use strong passwords; verify a patient's identity before engaging).

We encourage you to read the **IPC Case of Note related to third party technology service providers** and shared systems: https://www.ipc.on.ca/en/cases-of-note/custodians-must-ensure-phi-protected-even-when-using-third-party-providers.

We will add additional scenarios if/when we identify ones we consider 'essential reading' for the OHT and PCN context.

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Note from RISE: This tool is meant to be read in conjunction with the other tools in this PMDS toolkit, as well as the tools in a complementary data-sharing agreement (DSA) toolkit. RISE prepares both its own resources (like the RISE brief) that can support rapid learning and improvement, as well as provides a structured 'way in' to resources prepared by other partners and by the ministry. RISE is supported by a grant from Ontario Health to the McMaster Health Forum. The opinions, results and conclusions are those of RISE and are independent of Ontario Health and the Ontario Ministry of Health. No endorsement by Ontario Health or the ministry is intended or should be inferred.

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