



## INVESTIGATION REPORT 095-2025<sup>1</sup>

### Saskatoon School Division No. 13 and St. Paul's Roman Catholic Separate School Division No. 20

February 12, 2026

#### **Summary:**

Saskatoon School Division No. 13 (Saskatoon Public) proactively notified the Office of the Saskatchewan Information and Privacy Commissioner (OIPC) of a privacy breach that occurred in early 2025. The privacy breach occurred when five student cumulative records were lost during a physical transfer of the records between Saskatoon Public and St. Paul's Roman Catholic Separate School Division No. 20 (Saskatoon Catholic), and as of the issuance of this Investigation Report, have not been recovered.

The Commissioner found that:

- (1) the school divisions have not contained the privacy breach but, in the circumstances, reasonable efforts were expended by Saskatoon Public to try to recover the lost student cumulative records.
- (2) Saskatoon Public provided notifications to affected individuals that incorporated several of the best practices endorsed by OIPC;
- (3) the school divisions failed to sufficiently investigate what personal information was involved in the breach, they failed to identify all the affected individuals, and they did not sufficiently investigate how or why the privacy breach occurred;
- (4) the root cause of the privacy breach can be attributed to the failure of the school divisions to employ adequate administrative and physical safeguards, which contributed to human error; and
- (5) Saskatoon Public took reasonable steps to prevent similar

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<sup>1</sup> This Investigation Report also involves OIPC Investigation files 133-2025, 134-2025, 135-2025, 136-2025, and 003-2026.

privacy breaches from happening in the future, whereas Saskatoon Catholic did not.

The Commissioner recommended that:

- (1) going forward, the school divisions report the possible harms associated with a privacy breach and communicate prevention and mitigation strategies to all affected individuals;
- (2) the school divisions retain a copy of the student cumulative record prior to initiating a transfer and incorporate this policy into their administrative procedures; and
- (3) Saskatoon Catholic strengthen its administrative procedures with respect to the transfer of materials between mail services and staff and consider submitting copies of any privacy-related policy materials to OIPC's consultation process within 60 days of the issuance of this Investigation Report.

## I BACKGROUND

[1] On April 24, 2025, Saskatoon School Division No. 13 (Saskatoon Public) proactively reported the loss of five student cumulative records to the Office of the Saskatchewan Information and Privacy Commissioner (OIPC). A student cumulative record is the official collection of a student's educational history from the time of enrollment to secondary graduation. The following table illustrates the school of origin, the intended destination of the record, and the date the five lost student cumulative records were sent:

<b>Cumulative Record</b>	<b>Originating School</b>	<b>Intended Destination</b>	<b>Sent Date</b>
1	Oskāyak High School (Saskatoon Catholic)	Centennial Collegiate (Saskatoon Public)	January 30, 2025
2	Estey School (Saskatoon Public)	Centennial Collegiate (Saskatoon Public)	February 4, 2025
3	Marion Graham Collegiate (Saskatoon Public)	Centennial Collegiate (Saskatoon Public)	February 5, 2025
4	Holy Cross Collegiate (Saskatoon Catholic)	Centennial Collegiate (Saskatoon Public)	Early February - exact date unknown
5	Marion Graham	Aden Bowman	February 24, 2025

	Collegiate (Saskatoon Public)	Collegiate (Saskatoon Public)	
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[2] On June 18, 2025, OIPC notified Saskatoon Public that this office would investigate the privacy breach to assess whether the local authority responded appropriately pursuant to section 32 of *The Local Authority Freedom of Information and Protection of Privacy Act (LA FOIP)*.<sup>2</sup> Saskatoon Public complied with a request to provide a completed *Privacy Breach Investigation Questionnaire* (Questionnaire) for each of the five lost student cumulative folders by July 18, 2025. Saskatoon Public also provided supplemental information with respect to the management of student cumulative records.

[3] On August 21, 2025, OIPC informed Saskatoon Public that this office would be issuing an Investigation Report on the matter.

[4] On January 5, 2026, OIPC notified St. Paul's Roman Catholic Separate School Division No. 20 (Saskatoon Catholic), that this office would investigate and report on an assessment of its response to the privacy breach pursuant to the jurisdiction afforded by section 32 of *LA FOIP*. Saskatoon Catholic complied with a request to provide a completed Questionnaire for two lost student cumulative folders that originated from its schools on January 15, 2026.

## II DISCUSSION OF THE ISSUES

### 1. Jurisdiction

[5] Saskatoon Public and Saskatoon Catholic are both “local authorities” under section 2(1)(f)(viii) of *(LA FOIP)*. OIPC has jurisdiction to conduct this investigation under section 32 of *LA FOIP*.

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<sup>2</sup> *The Local Authority Freedom of Information and Protection of Privacy Act*, SS 1990-91, c. L27.1, as amended.

**2. Is personal information involved and did a privacy breach occur?**

[6] This office must ascertain whether personal information is involved to determine if a privacy breach has occurred. Personal information is defined by means of the non-exhaustive definition set out in section 23(1) of *LA FOIP*. OIPC recognizes that personal information is information that is:<sup>3</sup>

- about an identifiable individual, and
- that is personal in nature.

[7] Information is about an “identifiable individual” if the individual can be identified from the information (such as from a name or address) or the information could reasonably be expected to allow the individual to be identified if it is combined with information that is otherwise available. “Identifiable” means it is reasonable to expect the person could be identified if the information were disclosed.<sup>4</sup>

[8] Information is “personal in nature” if it reveals something personal about an identifiable individual. “Personal” means affecting or concerning a person, or regarding their private (rather than professional) life.<sup>5</sup>

***What the school policies require:***

[9] OIPC sought to verify the typical contents of a student cumulative record by assessing the requirements of *The Education Act, 1995*.<sup>6</sup> This legislation requires school authorities to maintain records of attendance and report on the progress of students, but it does not

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<sup>3</sup> OIPC [Investigation Report 253-2024, 033-2025](#) at paragraph [14].

<sup>4</sup> OIPC [Review Report 061-2024](#) at paragraph [38].

<sup>5</sup> *Ibid.*

<sup>6</sup> [The Education Act, 1995](#), SS 1995, c. E-0.2, as amended.

explicitly prescribe what records must be maintained. Even though the Ministry of Education document, *Student Cumulative Record Guidelines*, provides some guidance to the recommended requirements of a cumulative record, every school division may formulate its own procedures for the creation, maintenance, storage, and transfer of student cumulative records.

[10] Saskatoon Public proactively publishes administrative procedures (APs) on its website, including [AP 320](#) on “Student Cumulative Records.” Appendix A of that document outlines what a student cumulative record may contain for this school division.<sup>7</sup> Beyond those previously identified by Saskatoon Public at paragraph [9] of this Investigation Report, the following list offers a sample of additional data elements identified by *AP 320* as recommended content to include in a student cumulative record:

- **Inclusion and Intervention Plans:** students who need a significant level of support may benefit from this kind of plan. This is a flexible planning document developed by a collaborative team and adjusted for each child. It may describe supports and strategies that will optimize learning in an inclusive setting.
- **Custody orders:** these documents outline court ordered instructions for the care and safety of a child. Among other things, it sets out the parent with whom a child must live and the parent who may make decisions on behalf of the child’s best interests.
- **Medical information, including safety plans:** safety plans may be created for a student who poses a risk to themselves or others. It is comprehensive and outlines procedures to protect the individual student, staff and other students from harm and stipulates the situations that may provoke a harmful response.
- **Assessment reports:** the various professionals within a school team may have provided information related to a student’s mental health, cognitive, communicative and physical abilities. This information primarily assists with the ongoing care of the student and follows clinical documentation standards developed by the various oversight bodies to whom the professionals report.

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<sup>7</sup> Saskatoon Public [AP 320 – “Student Cumulative Records – Appendix A”](#) at pages 5 and 6.

- **Violent Threat Risk Assessment notifications:** this is a tool used to evaluate and response to potential violence and is used to develop intervention plans for a child. These plans are typically conducted by school administrators, law enforcement officers, and, at times, mental health professionals and community agencies.
- **Positive Behaviour Intervention Support plans:** these plans support a student in managing challenging behaviours that may interfere with the quality of life, safety or learning of the student. This plan typically offers explicit strategies for positively addressing a student's behaviour and can assist in the development of positive skills to replace unsupportive behaviours.
- **Jordan's Principle forms:** this is a document that ensures First Nations children do not face gaps, delays, or denials in accessing government services because of their identity as First Nations children. It is administered by Indigenous Services Canada.

[11] Saskatoon Catholic did not point to any documented policies or procedures related to student cumulative records. Our investigation revealed that Saskatoon Catholic originally understood the breach to be entirely the responsibility of Saskatoon Public, which was clearly not the case, since two of the five cumulative student records that were lost can be sourced to have originated from that school division.

***What may have been in the cumulative student records:***

[12] The Saskatoon Public Questionnaire asserted that the five lost student cumulative records involved the following common data elements:

- Student names, telephone numbers, student numbers, and dates of birth.
- Student registration forms, report cards and attendance records.
- Caregiver name(s), home address(es), phone number(s), and email(s).

[13] The lost student cumulative records were never recovered. Saskatoon Public compared

each student's electronic records in *Clevr*<sup>8</sup> to the standard contents outlined in *AP 320* to assess what type of information may have been in each student's cumulative record. Saskatoon Public reported that no documents such as safety plans, Violent Threat Risk Assessment notifications, or specialist reports were on file for each of the lost records. This could not be confirmed with certainty because Saskatoon Public acknowledged that it retained no copies or digital backups of the exact contents of the student cumulative records. It is not possible to state with absolute certainty which specific pieces of personal information or personal health information were included in the lost Saskatoon Public student cumulative records.

***Registration Forms:***

[14] A summary of the informal investigation conducted by Saskatoon Catholic confirmed that registration forms may have been present in the student cumulative records under its possession and control.

[15] Registration forms are completed at the elementary and secondary levels to collect information about students, caregivers, and associated parties as part of the enrollment process. OIPC reviewed a registration form developed by Saskatoon Public in a recent school year and observed that a wide range of data elements were requested in the form by Saskatoon Public.<sup>9</sup> The following list offers a small sample of notable data elements requested in that registration form:

- Newcomer legal status.
- Names and telephone numbers for three emergency contacts.
- Names and telephone numbers for childcare provider(s).

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<sup>8</sup> *Clevr* is a cloud-based system that helps schools manage electronic forms, data, collection, and administrative workflows.

<sup>9</sup> This is based on a review of the 2021-2022 elementary registration form for École Forest Grove School (Saskatoon Public) which had historically been publicly available online but is no longer available.

- Saskatchewan Health Card Number.
- Life-threatening and other medical conditions.
- Full names, birthdates, current schools, and grades of siblings living in the same home as the registering student.

[16] Saskatoon Catholic was silent with respect to what other types of personal information may have been lost in the privacy breach involving its lost student cumulative records. OIPC reviewed a Saskatoon Catholic registration form and observed a similar range of data elements requested in the form as noted in the public school form.<sup>10</sup>

***Report Cards:***

[17] Saskatoon Public requires the retention of report cards in student cumulative records. Saskatoon Catholic also confirmed that report cards were included in student cumulative records.

[18] Report cards are documents that convey an educator's assessment of a student's work, progress, and conduct over a specific period. Both school divisions use a digital platform known as *Edsby* to facilitate communication between faculty, staff, students, and community stakeholders and that digital platform generates report cards. The contents of report cards may vary across schools and educational levels, but a sample report card provided by Saskatoon Public provides the following list of notable data elements chronicled within a report card:

- A student identification number.
- Number of days absent or tardy within the reporting period.
- Factors affecting student achievement (personal and social growth) and subsequent evaluations of those factors in relation to each student.

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<sup>10</sup> This is based on a review of the [2026-2027 elementary registration form for Greater Saskatoon Catholic Schools](#) (Saskatoon Catholic).

- Indications of achievement (numeric or coded) in relation to outcomes a student is required to meet.
- Comments about students from classroom teachers.

[19] Saskatoon Public notified 12 affected individuals that the five lost student cumulative records contained “personal information such as report cards, student name and date of birth, names of parents from registration forms, and address...” This statement does not come close to capturing the mosaic effect of personal information that may have been contained in the lost student cumulative records.<sup>11</sup> The report card data alone may engage additional elements listed in section 23(1) of *LA FOIP* beyond those acknowledged by Saskatoon Public.

[20] The five lost student cumulative records may have *only* contained registration forms and report cards, although, given that all of the students were in secondary school and between the ages of 14 to 18, it is highly unlikely. Even still, the breadth of the personal information collected via a single, historical elementary registration form is substantial.

[21] The data elements as discussed above engage sections 23(1)(a), (b), (c), (d), (e), (h), and (k)(i) of *LA FOIP*, which state:

**23(1)** Subject to subsections (1.1) and (2), “**personal information**” means personal information about an identifiable individual that is recorded in any form, and includes:

- (a) information that relates to the race, creed, religion, colour, sex, sexual orientation, family status or marital status, disability, age, nationality, ancestry, or place of origin of the individual;
- (b) information that relates to the education or the criminal or employment history of the individual or information relating to financial transactions in which the individual has been involved;

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<sup>11</sup> The “mosaic effect” is a phrase that may be defined as “the principle that occurs when seemingly innocuous information, which in isolation appears meaningless or trivial, is connected with other available information to yield information that should be withheld.” See Nova Scotia OIPC [Review Report 24-14](#) at paragraph [20].

(c) information that relates to health care that has been received by the individual or to the health history of the individual;

(d) any identifying number, symbol or other particular assigned to the individual;

(e) the home or business address, home or business telephone number, fingerprints or blood type of the individual;

...

(h) the views or opinions of another individual with respect to the individual

...

(k) the name of the individual where:

(i) it appears with other personal information that relates to the individual; or

[Emphasis added]

[22] There is a finding that information involved in the five lost student cumulative records qualifies as personal information, pursuant to subsections 23(1)(a), (b), (c), (d), (e), (h) and (k)(i) of *LA FOIP*. There is a finding that a privacy breach occurred when the five student cumulative records were lost during a physical transfer of the records between the school divisions, that as of the issuance of this Investigation Report, have not been recovered.

### **3. Did the school divisions respond appropriately to the privacy breach?**

[23] When there is a consensus that a privacy breach has occurred, the focus is to then determine how the local authorities handled the privacy breach. This office has historically established four best practice steps to assist a local authority in its response.<sup>12</sup> This Investigation Report will now focus on the four following best practice steps to this privacy breach and how the school divisions responded to each:

a) Breach containment (as soon as possible).

b) Notification of affected individuals (as soon as possible).

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<sup>12</sup> OIPC [Investigation Report 155-2025](#) at paragraph [38].

- c) Investigate the breach.
- d) Prevention steps for the future.

***a) Breach Containment (as soon as possible)***

- [24] Once discovered, local authorities must take swift action to contain the breach. Effective and prompt containment reduces the magnitude and risk associated with a privacy breach. Containment may require local authorities to recognize and stop unauthorized practices, recover records, deactivate breached systems, revoke access privileges, and/or correct weaknesses in security.<sup>13</sup> In the present case, record recovery and security (administrative) weaknesses are the relevant concerns.
- [25] Saskatoon Public has continued to search for, and attempted the recovery of, the five lost student cumulative records. Saskatoon Public asserted that, between April 11 and May 1, 2025, it sought information regarding the preparation of, transfer of, and follow-up regarding the requested student cumulative records at the respective schools and their mailroom facilities. On top of individual staff interviews, school and mail services staff were required to conduct comprehensive searches of their facilities and mail delivery vehicles. In addition, Saskatoon Public requested that *all* schools across the division search their premises for the five lost student cumulative records. Unfortunately, these efforts yielded no success.
- [26] Saskatoon Catholic provided no comment on containment efforts. As noted earlier, our investigation has revealed that Saskatoon Catholic understood that the breach was entirely the responsibility of Saskatoon Public.
- [27] There is a finding that the school divisions failed to contain the privacy breach. In the circumstances, reasonable efforts were expended by Saskatoon Public to recover the lost student cumulative records.

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<sup>13</sup> OIPC resource [Privacy Breach Guidelines for Government Institutions and Local Authorities](#) at page 6.

***b) Notification of Affected Individuals (as soon as possible)***

[28] Once a privacy breach has been identified, local authorities must take all reasonable steps to notify individuals affected of the unauthorized activity.<sup>14</sup> In doing so, local authorities should identify possible risks and notify the affected individuals so they may take steps to protect themselves.<sup>15</sup>

[29] OIPC confirmed that Saskatoon Public provided written and verbal notifications of the privacy breach to the affected individuals. This included the five students whose cumulative records were lost and seven of their caregivers.

[30] By contrast, Saskatoon Catholic asserted that only two students were affected individuals. Saskatoon Catholic did not provide any notification as it understood that Saskatoon Public had already done so.

[31] Saskatoon Public provided OIPC with copies of the email messages sent to caregivers. The correspondence covered several of best practices as endorsed by this office, including:

- A description of how the privacy breach occurred and the nature of the personal information at issue.
- An outline of the steps taken by Saskatoon Public to recover the lost student cumulative records.
- An apology and acknowledgment of the concern the privacy breach may have caused.
- An indication of the right to file an official complaint with OIPC.
- An invitation for the affected individuals to contact Saskatoon Public superintendent with any questions.

[32] Saskatoon Public followed up with telephone calls and emails to the affected individuals.

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<sup>14</sup> Section 28.1 of *LA FOIP*.

<sup>15</sup> *Supra*, footnote 13 at page 8.

A telephone script was provided to this office.

- [33] Notification should include a description of the potential harms because of the privacy breach. This issue was not addressed in the present case. Based on the information provided by Saskatoon Public we cannot conclude with confidence that the affected individuals understood the potential risks connected to this privacy breach.
- [34] Saskatoon Public did not share its privacy breach mitigation and prevention strategies with the affected individuals. OIPC encourages both school divisions to do so, to strengthen public trust in their commitment to the protection of privacy. These risks can include identity theft and the possible misuse of health card information if the information gets into the wrong hands.
- [35] There is a finding that Saskatoon Public provided notifications to affected individuals that incorporated several of the best practices endorsed by OIPC. However, there will be a recommendation that the school divisions report on the possible harms associated with a privacy breach and communicate prevention and mitigation strategies to all affected individuals going forward.

*c) Investigate the Breach*

- [36] Local authorities must thoroughly investigate a breach of privacy by methodically examining the incident which will allow for a conclusion as to the root cause. At the conclusion of an investigation, local authorities should have a solid understanding of:<sup>16</sup>
  - What actually occurred?
  - What contributed to a privacy breach?
  - Why a privacy breach unfolded as it did?
  - How to prevent similar future privacy breaches.

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<sup>16</sup> *Ibid*, at page 9.

[37] To evaluate the investigation conducted by the school divisions, OIPC needed to assess how each school division determined *what actually happened*.

[38] Based on the information provided to this office, two schools (Centennial Collegiate and Aden Bowman Collegiate) requested student cumulative records from five different Saskatoon-area schools: three from Saskatoon Public and two from Saskatoon Catholic. In this day and age of electronic records – we note that this privacy breach involves paper records. Each school was to send the respective student cumulative record through inter-school mail. However, the intended destination schools informed the schools of origin that the student cumulative records failed to arrive. Therefore, the school divisions were unable to definitively conclude whether the student cumulative records were lost while in the possession of the school-based staff or the mail delivery staff.

[39] This office reproduced the timeline from the information provided to us by Saskatoon Public:

Student Cumulative Record 1
<ul style="list-style-type: none"><li>• <b>January 29, 2025:</b> Centennial Collegiate (Saskatoon Public) requested a student cumulative record from Oskāyak High School (Saskatoon Catholic).</li><li>• <b>January 30, 2025:</b> Oskāyak High School sent the student cumulative record to Centennial Collegiate.</li><li>• <b>March 17, 2025:</b> Centennial Collegiate contacted Oskāyak High School to state that the student cumulative record had not arrived, as expected.</li></ul>
Student Cumulative Record 2
<ul style="list-style-type: none"><li>• <b>February 4, 2025:</b> Centennial Collegiate (Saskatoon Public) requested a student cumulative record from Estey School (Saskatoon Public). Estey School sent the student cumulative record to Centennial Collegiate on the same date.</li><li>• <b>March 17, 2025:</b> Centennial Collegiate contacted Estey School to</li></ul>

state that the student cumulative record had not arrived, as expected.

#### Student Cumulative Record 3

- **February 5, 2025:** Centennial Collegiate (Saskatoon Public) requested a student cumulative record from Marion Graham Collegiate (Saskatoon Public). Marion Graham Collegiate sent the student cumulative record to Centennial Collegiate on the same date.
- **March 17, 2025:** Centennial Collegiate contacted Marion Graham Collegiate to state that the student cumulative record had not arrived, as expected.

#### Student Cumulative Record 4

- **Early February 2025:** Centennial Collegiate (Saskatoon Public) requested a student cumulative record from Holy Cross Collegiate (Saskatoon Catholic). Also sometime in early February, Holy Cross Collegiate sent the student cumulative record to Centennial Collegiate.
- **April 2, 2025:** Centennial Collegiate contacted Marion Graham Collegiate to state that the student cumulative record had not arrived, as expected.

#### Student Cumulative Record 5

- **February 10, 2025:** Aden Bowman Collegiate (Saskatoon Public) requested a student cumulative record from Marion Graham Collegiate (Saskatoon Public).
- **February 24, 2025:** Marion Graham Collegiate sent the student cumulative record to Aden Bowman Collegiate.
- **April 2, 2025:** Aden Bowman contacted Marion Graham to state that the student cumulative record had not arrived, as expected.

[40] Based on a review of the timeline, and most curiously, there is no obvious one day the student cumulative records went missing. It is impossible to state *when* the records went missing. According to the information provided by Saskatoon Public, student cumulative

records were in transit over the course of at least nine working days (January 29 through February 10, 2025). Moreover, the student cumulative records were not reported as unaccounted, for over 30 working days, with the earliest concern about an incomplete transfer raised on March 17, 2025. This is all most curious and remains a mystery.

- [41] In addition, the information provided by Saskatoon Public does not suggest an apparent epicentre of the privacy breach, as five different schools across two school divisions initiated transfers that were not received at two distinct collegiates. The only conclusion is that there is no knowledge of *how* the privacy breach occurred. We find this somewhat disquieting.
- [42] Another fundamental concern in this investigation is *what personal information was actually breached?* As stated earlier in this Investigation Report, OIPC is concerned that the school divisions did not sufficiently account for the spectrum of personal information in the student cumulative records. In turn, it is quite possible that more affected individuals are at risk in this privacy breach. For example, the school divisions did not account for the possibility that the personal information of siblings or emergency contacts outside of immediate caregivers may have been present within the five lost student cumulative records.
- [43] OIPC must next consider how the school divisions investigated *why* that personal information was breached.
- [44] Central to the privacy breaches was the use of inter-school mail services. Saskatoon Public explained how the inter-school mail system works:
  - Saskatoon Public employs its own mail services staff.
  - Smaller, flatter materials are mailed by administrative staff in re-usable envelopes. The re-usable envelope has a front that identifies to whom the material is to be sent and from whom the material is sent. The date and other

details are included. The back of the re-usable envelope has a tie closure. The student cumulative records were prepared for mail services collection in these re-usable envelopes.

- Mail services staff collect materials from school offices, usually from an administrative assistant. If an administrative assistant is not available, the mail services staff have keys to access the location where the mail is kept for collection.
- While in transit, mail services staff secure materials stored in either a canvas bin (larger, bulkier materials) or on shelves in blue bags (smaller, flatter materials) in the mail services vehicle.
- Mail services staff are instructed to keep their school division-issued vehicles locked when entering and exiting the vehicle.
- Mail services staff bring collected mail from school sites to a main mailroom. They then sort it into school-labelled mail bags that are then transported to the respective schools in mail service vehicles.
- Upon arrival, mail service staff deposit the mail at designated locations within the school offices.

[45] Saskatoon Public conducted interviews with administrative and mail services staff to develop a timeline and ascertain the factors that may have contributed to the privacy breach. All administrative staff used the re-usable envelopes and each had different methods for documenting when and what was prepared for transfer. Based on the information provided to OIPC the schools and the mailroom do not have a system of documenting incoming and outgoing mail. Due to this lack of documentation, Saskatoon Public cannot conclusively state at what point in the transfer process the student cumulative records were lost.

[46] Interviews with administrative staff at Saskatoon Catholic revealed the transfer of records was documented in *MySchoolSask* which is the centralized provincial student information system of the Ministry of Education. Each of the student cumulative records was stored in a white folder to which a yellow slip indicating the destination school and date was stapled.

Saskatoon Catholic provided no further information regarding the mail service process.

[47] Regrettably, neither Saskatoon Public nor Saskatoon Catholic have any idea how the five student cumulative records were lost and who may be responsible.

[48] Any investigation into *how* or *why* a privacy breach occurred necessitates an evaluation of *how to prevent* a similar future scenario, including an analysis of safeguards.

[49] As alluded to earlier, the investigation by local authorities should include a root cause analysis, which assumes that systems and events are interrelated. In other words, an action (or inaction) in one area often triggers a result in another area. By tracing back these actions and inactions, the source of a problem (root cause) can be discovered, as well as how the problem festered into the situation now being faced: a privacy breach.

[50] Saskatoon Catholic did not investigate the root cause, citing the position that Saskatoon Public took responsibility for the privacy breach. Saskatoon Public simply attributed the root cause to human error. If neither school division has any idea how or why the records were lost – the simple resort to human error is difficult to accept.

[51] There are three basic sources behind a root cause analysis:<sup>17</sup>

- A “physical cause” can be attributed when established physical or technical safeguards fail. A physical cause of a privacy breach may be, for example, a lock on a filing cabinet being broken and not replaced.
- A “human cause” can be attributed when an individual(s) fails to act appropriately in relation to their training. A human cause of a privacy breach may be, for example, an employee failing to lock the filing cabinet.
- An “organizational cause” can be attributed when a system, process, or policy (administrative safeguard) that people use to make decisions has

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<sup>17</sup> OIPC [Guide to LA FOIP, Chapter 6, “Protection of Privacy”](#) at page 240.

failed.<sup>18</sup> An organizational cause of a privacy breach may be, for example, that there was no clearly communicated policy for an employee to lock the filing cabinet.

[52] OIPC notes that there was no standardized process in place for administrative staff in the schools to track the delivery of or to confirm receipt of student cumulative records when the records went missing. The absence of a standardized process likely contributed to the inability to identify why and how the privacy breaches occurred. Subsequently, Saskatoon Public implemented a standardized student cumulative records transfer process. In addition, Saskatoon Public recognized that the mailroom relied on manual sorting and did not employ distinct systems for the handling of sensitive documents, which may have left student cumulative records vulnerable to mishandling with the general mail. By extension, Saskatoon Public identified that, whereas professional development for administrative staff included privacy training, mail services staff had previously received no such training.

[53] Similarly, the investigation by Saskatoon Public revealed awareness about the need for heightened physical safeguards.<sup>19</sup> Saskatoon Public noted the need to emphasize to staff the importance of secure storage facilities, secure delivery vehicles, and mail delivery bags. Staff is also instructed to ensure that mailed material is always placed in designated areas. Also, as a result of the internal investigation, Saskatoon Public pledged to implement a distinct system for handling sensitive documents.

[54] There is a finding that the school divisions did not sufficiently investigate what personal information was involved in the breach, they did not fully identify all the affected individuals or sufficiently investigate how or why the privacy breach occurred. There is a finding that the root cause of the privacy breach was the failure of the school divisions to

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<sup>18</sup> “Administrative safeguards” are controls that focus on an organization’s policies and procedures and the maintenance of security measures that protect personal information. OIPC [Investigation Report 021-2023, 036-2023](#) at paragraph [52].

<sup>19</sup> “Physical safeguards” are physical measures, policies, and procedures used to protect personal information (and related buildings and equipment) from unauthorized intrusion as well as natural and environmental hazards. OIPC [Investigation Report 092-2022](#) at paragraph [28].

employ adequate administrative and physical safeguards, which contributed to human error.

***d) Prevention Steps for the Future***

[55] The need to implement measures that prevent a similar breach from occurring in the future cannot be overstated. Possible prevention measures may include creating (or making changes to) policies and procedures, adding or enhancing safeguards already in place, providing additional training, and considering whether a practice should be stopped, to prevent a future similar privacy breach.<sup>20</sup>

[56] Since this privacy breach, Saskatoon Public has taken preventative measures within the administrative processes at the school level. *AP 320* has been revised with respect to Student Cumulative Records as of August of 2025. The revisions include a brand new process for the transfer of student cumulative records outside of a school:

- The principal (or a designate) must review each student cumulative record to remove and shred unnecessary information and ensure the record contains current student records and documentation. (See section 5.3.2 of *AP 320*.)
- When a student cumulative record leaves a school, the principal must document the student's name, new school, and the date the record was sent. By extension, the principal at the new school must document the student's name, previous school, and date that the record was received. (See section 5.3.3. of *AP 320*)
- A student cumulative record not received, as expected, within seven working days of the initial request must result in correspondence between the principals of the two schools. (See section 5.4.1. of *AP 320*.)
- For each student transfers, the transfer of that student's cumulative records is also documented in *MySchoolSask* and in a school-based Microsoft *Excel* spreadsheet.
- Saskatoon Public trained administrative staff in these changes to administrative procedures on August 27, 2025.

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<sup>20</sup> *Supra*, footnote 13 at page 10.

[57] Saskatoon Public further engaged preventative measures by providing an inaugural privacy training to mail services staff on August 27, 2025, to be refreshed annually. Relevant to this privacy breach, the training emphasized:

- The fundamentals of *LA FOIP*, including why it is relevant to a school division, what constitutes personal information, and what is expected within the mailroom in terms of protecting privacy.
- Mail services staff are only to collect (or handle) what is necessary for the fulfillment of assigned work. Further, mail services staff should provide information access on a need-to-know basis and should only retain records for the time and purpose that they were created.
- Mailroom storage facilities, delivery trucks, and mail delivery bags must always remain locked to prevent theft or loss. Delivered materials should always be placed in designated areas to support documentation at the school level.

[58] However, Saskatoon Public does not appear to have considered how to strengthen procedures around the physical transfer of materials at that pivotal intersection when mail services staff collect materials from (and deliver to) schools. This appears to be a significant oversight, as the responsibility to document what is being relocated, by whom, and when, are critical factors. If Saskatoon Public had strong procedures in place to address these questions, the lost student cumulative records may have been recovered and the privacy breach, subsequently, contained. Therefore, failing to strengthen procedures for these processes is failing to mitigate a similar potential privacy breach.

[59] Saskatoon Public has committed to reviewing the mailroom processes further. It was explained that a colour coding of the mail bags may assist in the identification of sensitive information. As of the issuance of this Investigation Report, this change has not been implemented.

[60] Overall, OIPC commends Saskatoon Public for incorporating these new administrative safeguards to better facilitate the smooth transfer of records between schools.

[61] OIPC has recommended in previous investigation reports that there is value in retaining a

copy of all records being transferred to another site. This parallels direction from the *Student Cumulative Record Guidelines* provided by the Ministry of Education. Doing so would allow for the clear identification of what personal information was involved in any potential breach and allow for the reproduction of records, especially in situations wherein containment was at issue, as it is for the school divisions in this matter.<sup>21</sup>

- [62] We understand that the Ministry of Education *Student Cumulative Record Guidelines* was drafted to conceive of paper documents only. We cannot help but observe that had these documents been fully electronic – the collection and transfer of the document would have been so much easier. In effect, email to email, circumventing the mailroom altogether. However, we understand that this process may not be practical at the time and, as a result, we hesitate to make a recommendation to this effect. Still, in this modern time, the digital transfer of records can be easier, faster and done with a great deal more security than the present process.
- [63] By contrast, Saskatoon Catholic has identified minimal steps to prevent future breaches of this nature. In the Questionnaire, the only comment it provided regarding prevention was, “Moving forward, staff will be informed that the need to report any delayed or missing cumulative records directly to the Privacy Officer to ensure compliance with our updated protocols.” However, at no point did Saskatoon Catholic explain what those updated protocols were, or how those protocols were responsive to the factors that may have contributed to this privacy breach. Overall, OIPC is concerned that Saskatoon Catholic has assumed less responsibility for the privacy breach than is reasonably appropriate. It does not appear that Saskatoon Catholic has sufficiently considered what factors contributed to the breach in order to assess internal weaknesses. The duty of a local authority to protect personal information applies to both Saskatoon Public and Saskatoon Catholic.
- [64] There is a finding that Saskatoon Public took reasonable steps to prevent similar privacy breaches in the future. There is a finding that Saskatoon Catholic did not take reasonable steps to prevent similar privacy breaches in the future. There will be a recommendation

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<sup>21</sup> OIPC [Investigation Report 033-2023; 042-2023](#) at paragraph [36].

that Saskatoon Catholic strengthen its administrative procedures with respect to the transfer of materials among mail services within 60 days of the issuance of this Investigation Report. This office is always pleased to review and provide a consultation service on such materials.<sup>22</sup> There will also be a recommendation that both school divisions retain a copy of the student cumulative record prior to initiating a transfer and incorporate this into their administrative procedures.

### III FINDINGS

- [65] OIPC has jurisdiction to conduct this investigation pursuant to section 32 of *LA FOIP*.
- [66] The information involved in this privacy breach qualifies as personal information pursuant to sections 23(1)(a), (b), (c), (d), (e), (h) and (k)(i) of *LA FOIP*.
- [67] A privacy breach occurred when five student cumulative records were lost during a physical transfer of the records and those records have never been recovered as of the date this Investigation Report.
- [68] The school divisions have not contained the privacy breach but, in the circumstances, reasonable efforts were expended by Saskatoon Public to recover the lost student cumulative records.
- [69] Saskatoon Public provided notifications to affected individuals that incorporated several of the best practices endorsed by OIPC.
- [70] The school divisions did not sufficiently investigate what personal information was involved in the breach, or identify all the affected individuals, nor did the school divisions sufficiently investigate how or why the privacy breach occurred.

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<sup>22</sup> OIPC reviews programs, policies or procedures, privacy impact assessments, educational material, and more, ideally before being implemented. To receive feedback, a [consultation form](#) must be completed. OIPC provides guidance, but cannot design, approve, or endorse any program or initiative. Neither does OIPC provide legal advice.

- [71] The root cause of the privacy breach can be attributed to the failure of the school divisions to employ adequate administrative and physical safeguards, which contributed to human error.
- [72] Saskatoon Public took reasonable steps to prevent a similar privacy breach in the future.
- [73] Saskatoon Catholic did not take reasonable steps to prevent a similar privacy breach in the future.

#### **IV RECOMMENDATIONS**

- [74] I recommend that, going forward, the school divisions report possible harms associated with a privacy breach and communicate prevention and mitigation strategies to all affected individuals.
- [75] I recommend that the school divisions retain a copy of the student cumulative record prior to initiating a transfer and incorporate this into their administrative procedures.
- [76] I recommend that, within 60 days of the issuance of this Investigation Report, Saskatoon Catholic strengthen its administrative procedures with respect to the transfer of materials among mail services and school staff and consider submitting copies of any privacy-related materials to OIPC's consultation process.

Dated at Regina, in the Province of Saskatchewan, this 12<sup>th</sup> day of February, 2026.

Grace Hession David  
Saskatchewan Information and Privacy Commissioner