

# ACCOUNTABILITY FRAMEWORK TRAINING PROGRAM

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&

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# About the Presenters

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- ▣ Sara Levine:
  - Lawyer advises clients in all areas of privacy and freedom of information law
  - Member of the IAPP Canadian Advisory Board
  - Author - privacy law text and public education websites
  - Former privacy officer for national law firm
  - Past Co-Chair of CBA-BC Privacy and Freedom of Information subsection

# About the Presenters

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- ▣ Drew McArthur:
  - Former Chief Privacy and Compliance Officer with TELUS Communications
  - Founding member Canadian Council of CPOs
  - IAPP CIPP/C certification
  - Member BC Information and Privacy Commissioner External Advisory Board

# What is Accountability?

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- ▣ Acceptance by an organization of responsibility for personal information protection
- ▣ The first among the fair information principles (OECD and PIPEDA)
  - Policies and procedures that promote good practices
  - In its entirety is a privacy management program or Accountability Framework

# Accountability Framework

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- Goal – At a minimum: compliance with applicable laws. Can be a differentiator.
  - ▣ Effects – builds trust and confidence in the organization
  - ▣ Effects – enhances reputation

# Framework Should Be

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- ▣ Practical and effective to deal with changing services, administrative structures and law.
- ▣ Embedded into an organization's operations
- ▣ Evidence of an existing program for regulators in an investigation, audit or privacy breach

# Building Blocks

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- ▣ Organizational commitment – internal governance structure
  - Tone at the top
  - Privacy officer with authority
  - Privacy office (depending on size of org)
  - What reporting and to whom?

# Building Blocks

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- ▣ Program controls
  - P.I. inventory
- ▣ Internal policies and approaches
  - Client information management
  - Employee information management
  - Document retention and destruction program



# Building Blocks

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- ▣ External communication – public-facing policies
- ▣ Training and education approach
- ▣ Service provider and vendor management

# Building Blocks

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- ▣ Risk Assessment Tools:
  - Privacy Impact Assessment
  - Security Threat and Risk Assessment
  
- ▣ Breach and incident management response protocols

# Ongoing Assessment and Revision

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- ▣ Ongoing oversight and review integrated with risk management program
- ▣ Assess and revise program controls periodically
- ▣ Evidence-based (the measurement challenge)

# But Where to Start?

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- ▣ Your privacy management program must be *practical, sensible and tailored*
  
- ▣ Our Accountability Framework Workshop
  - Not a one-time fix
  - A skills transfer to help an organization implement and maintain its own program

# Our Workshops

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- ▣ User-friendly
- ▣ Practical exercises
- ▣ Reinforce concepts
- ▣ Discuss common challenges and responses

# Outcome?

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- ▣ Know how to identify and address barriers to implementation
- ▣ More comfortable with the basic concepts underlying an accountability program
- ▣ Ready to put what you've learned to use

# Who Should Attend?

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- ▣ Senior managers with information management or governance and control responsibilities
- ▣ Operational managers who need to understand the mechanisms and controls required for implementation

# For further information:

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