

PRIVACY MANAGEMENT PROGRAM - AT A GLANCE

A. BUILDING BLOCKS

Organizational Commitment	a) Buy-in from the top	Senior management support is key to a successful privacy management program and essential for a privacy respectful culture.
	b) Privacy Officer	<ul style="list-style-type: none"> • Role exists and is fundamental to business decision-making process. • Role and responsibilities for monitoring compliance are clearly identified and communicated throughout the organization. • Responsible for the development and implementation of the program controls and their ongoing assessment and revision.
	c) Privacy Office	<ul style="list-style-type: none"> • Role is defined and resources are identified and adequate. • Organizational structure supports the ability of staff to monitor compliance and foster a culture of privacy within the organization. • Ensures privacy protection is built into every major function involving the use of personal information.
	d) Reporting	Reporting mechanisms need to be established, and they need to be reflected in the organization's program controls.

Program Controls	a) Personal Information Inventory	The organization is able to identify: <ul style="list-style-type: none"> • the personal information in its custody or control, • its authority for the collection, use and disclosure of the personal information, and the sensitivity of the personal information.
	b) Policies	<ul style="list-style-type: none"> i. Collection, use and disclosure of personal information, which include requirements for consent and notification ii. Access to and correction of personal information iii. Retention and disposal of personal information iv. Responsible use of information and information technology, including administrative, physical and technological security controls and role-based access v. Challenging compliance
	c) Risk Assessment Tools d) Training and education requirements e) Breach and incident management response protocols f) Service Provider management g) External communication	

B. ONGOING ASSESSMENT AND REVISION

Oversight and Review Plan	a) Develop an oversight and review plan	Privacy Officer should develop an oversight and review plan on an annual basis that sets out how s/he will monitor and assess the effectiveness of the organization's program controls.
Assess and Revise Program Controls As Necessary	a) Update personal information inventory b) Revise policies c) Treat risk assessment tools as evergreen d) Modify training and education e) Adapt breach and incident response protocols f) Fine-tune service provider management g) Improve external communication	