



Office of the Information and Privacy Commissioner for Nova Scotia

Privacy Management Program - At a Glance<sup>1</sup>

A. Building Blocks		
<b>Public Body Commitment</b>	<b>Executive-level support</b>	Senior executive-level management support is key to a successful privacy management program and essential for a privacy respectful culture. Core elements of support include approval of adequate funding and regular review of reports.
	<b>Privacy Officer</b>	<ul style="list-style-type: none"> <li>• Role is defined and is fundamental to business decision-making process.</li> <li>• Role and responsibilities for monitoring compliance are clearly identified and communicated throughout the public body.</li> <li>• Responsible for the development and implementation of the program controls and their ongoing assessment and revision.</li> <li>• Adequate resources are identified.</li> <li>• Public body, municipality or health custodian structure supports the ability of staff to monitor compliance and foster a culture of privacy within the public body.</li> <li>• Ensures privacy protection is built into every major function involving the use of personal information.</li> </ul>
	<b>Reporting</b>	Reporting mechanisms should be established and they need to be reflected in the public body's program controls.
<b>Program Controls</b>	<b>Personal Information Inventory</b>	The public body, municipality or health custodian is able to identify: <ul style="list-style-type: none"> <li>• The personal information in its custody or control,</li> <li>• Its authority for the collection, use and disclosure of personal information and</li> <li>• The sensitivity of the personal information.</li> </ul>
	<b>Policies</b>	<ul style="list-style-type: none"> <li>• Privacy policy</li> <li>• How to request access or correction</li> <li>• Complaints policy</li> </ul>
	<b>Risk assessment tools</b>	<ul style="list-style-type: none"> <li>• Privacy impact assessments</li> <li>• System risk and threat assessments</li> </ul>
	<b>Training</b>	<ul style="list-style-type: none"> <li>• Privacy basics for all staff</li> <li>• Privacy breach training for all staff</li> <li>• Advanced and refresher training as required</li> </ul>
	<b>Breach management protocols</b>	<ul style="list-style-type: none"> <li>• Privacy breach policy</li> <li>• Breach notification assessment tool</li> <li>• Breach management protocol</li> </ul>
	<b>Service provider management</b>	<ul style="list-style-type: none"> <li>• Have standard clauses available to ensure service provider compliance with privacy law requirements &amp; monitor compliance.</li> </ul>
	<b>Communication</b>	<ul style="list-style-type: none"> <li>• Inform individuals of their rights &amp; the public body's policies</li> </ul>

<sup>1</sup> These materials are based on the paper, "Getting Accountability Right with a Privacy Management Program" prepared by the Office of the Information and Privacy Commissioner of Alberta, the Office of the Privacy Commissioner of Canada and the Office of the Information and Privacy Commissioner of British Columbia.

**B. Ongoing Assessment and Revision**

<b>Oversight &amp; Review Plan</b>	<b>Develop an oversight and review plan</b>	Privacy Officer should develop an oversight and review plan on an annual basis that sets out how she will monitor and assess the effectiveness of the public body's program controls.
<b>Assess and Revise Program Controls</b>	<b>Updates and revisions</b>	<ul style="list-style-type: none"><li>• Update personal information inventory</li><li>• Revise policies</li><li>• Treat risk assessment tools as evergreen</li><li>• Modify training and education</li><li>• Adapt breach and incident response protocols</li><li>• Fine-tune service provider management</li></ul>