



Office of the Chief Information
and Privacy Officer

NEW! Privacy Compliance Tool

Office of the Chief Information and Privacy Officer
Enterprise Architecture Openhouse, June 23, 2008

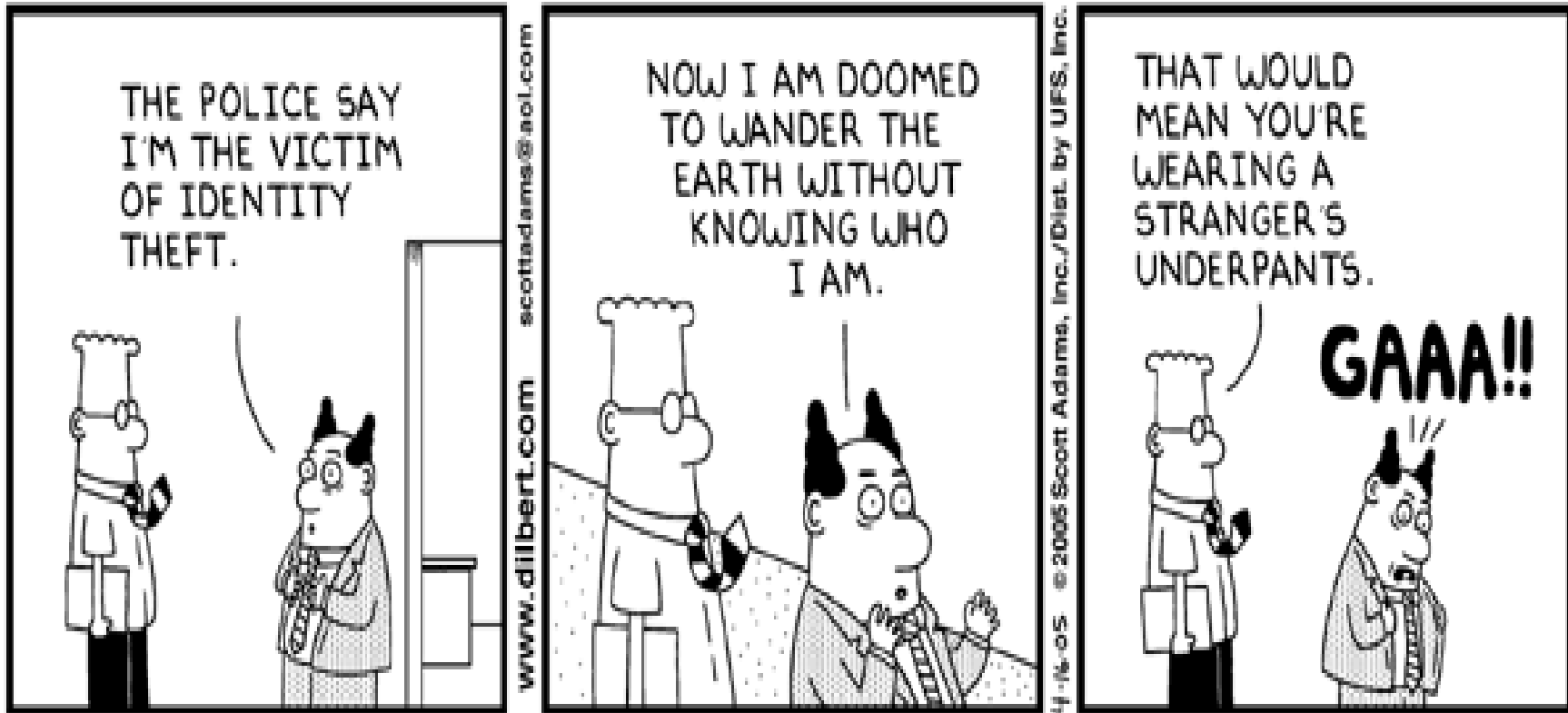
Outline

- **Why privacy is important**
- **Assessing privacy impact of your project**
- **Building privacy protection into the design of your project**
- **Getting started – Privacy Compliance Tool**

Privacy is a fundamental right...

- Ontarians entrust government with their personal information to access services and entitlements
- *Freedom of Information and Protection of Privacy Act (FIPPA)* establishes rules for protecting personal information that guide operational processes
- When personal information is not properly protected, the privacy of affected individuals may be violated. Once privacy is violated it can never be restored

Identity theft



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Unauthorized disclosure



Surveillance



Five reasons to assess privacy

- **Preserving Public Trust** - stewardship of personal information fundamental to maintaining public's trust and confidence
- **Upholding the Value of Privacy** - recognizing importance and value of privacy in society
- **Legislative Compliance** - FIPPA requirements
- **Fulfilling Corporate Requirements** - directives, gating and architectural review processes
- **Effective Project Management** - privacy is one of key risks all projects need to address

Privacy Impact Assessments (PIAs) an enabler

PIA helps you in a proactive, systematic way to identify:

- if your project involves personal information
- what legislation applies to your project
- how personal information will be collected, used, retained, disclosed and destroyed by whom and for what purpose
- the impact your project deliverables may have on privacy - the privacy risks
- the key privacy requirements to be designed into your program to minimize risk, compliance with legislation and OPS requirements

Getting started

- Every project needs to determine if it will impact privacy at the concept stage
- Compliance Tool will help kick off the PIA process
- Assesses whether personal information is involved
- Facilitates gathering of information relevant to privacy analysis
- Assesses privacy impact (H,M,L)
- Requirement of gating (0,1) and architectural checkpoint (0)

Privacy Compliance Tool

Unclassified

- Overview - introduces the tool
- How to - explains how to enter data and interpret results
- Questions - asks a series of questions to assess privacy compliance and identify risks
- Notes - provides explanatory notes for questions
- Scoring - estimates a risk level based on your responses to the questions
- Summary - provides a synopsis of key risks based on your responses to the questions
- Optional Approval Sign-off Sheet - for use in your approvals process

Gathering Information

Unclassified

40 questions to address:

- What data is involved?
- Who is involved?
- How data will be collected, used, and disclosed by various Organizations?
- What you plan to do and why?
- What changes to business processes and information technology systems are planned?
- What relevant privacy work has already been done?
- What security measures are in place or required?

Key Resources

Unclassified

Ministry

- Program staff (e.g., Business Analyst, Policy Advisor)
- I&IT project resources (e.g., Systems Developer, Cluster Information Architect, Cluster Security Officer or Architect)
- FIPPA Coordinator
- Legal Counsel
- Staff responsible for records retention schedules

Central Agency

- OCIPPO, MGCS
- Archives, MGCS
- Corporate Security, MGCS
- Enterprise Architecture, MGCS

Understanding the results

- Two scenarios - No personal information or personal information
- Scoring – High, medium or low, based on a completed questionnaire
- “Unknowns” are risky
- Summary - provides a synopsis of key risks relating to data, legal compliance, and project risks
- Table identifies questions evaluated and gives suggestions
- Should be reviewed in consultation with OCIPPO

Next steps

- Use the Privacy Compliance Tool to:
 - Inform project sponsor and team about privacy issues
 - Prepare briefing materials for approvals
 - Plan resource requirements for a PIA
 - Start the PIA by re-using the results
 - Consult further with key resources to gather more detail, develop options
 - Compare results if changes occur
 - Manage project documentation

In closing...

- Protecting personal information is fundamental to achieving your project's goals
- Privacy due diligence can never start too early and must continue through the lifecycle of a project
- Privacy Compliance Tool is the first implementation of several tools under development in the Office of the Chief Information and Privacy Officer
- Privacy Compliance Tool is a requirement in the Gating and Architectural Checkpoint process

We're happy to help...

Heather Clarke

A/Manager Access and Privacy

Office of the Chief Information and Privacy Officer

Heather.Clarke@ontario.ca

Caroline Crnekovic

Senior Policy Advisor

Office of the Chief Information and Privacy Officer

Caroline.Crnekovic@ontario.ca