









## Initial Steps

- Conducted audit of current practices in 2002 to assess privacy gaps (non-compliance or risk of)
  - another audit completed following program implementation in 2004 to address outstanding issues
- Privacy Project Team / HR Privacy Coordinator developed Privacy Policy & Procedures, communications, processes, practical guidelines for HR, leaders and supervisors
- Developed comprehensive Privacy Office reference manuals and guidelines
- Developed Privacy Impact Assessment methodology and awareness



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## Consent Model

Followed Alberta and British Columbia PIPA guidelines

- Implied consent for existing and former employees upon Privacy program implementation January 2004
- Express consent for new hires and new retirees / terminations since January 2004
- Assume all personal information collected is reasonable for legal and program administration and, therefore, opting out may not be possible in most cases



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Questions?

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