

10 TOP TIPS to help Privacy Officers build a privacy culture

By law, every agency must have a Privacy Officer who's responsible for ensuring the agency's compliance. But to be effective the Privacy Officer needs to have the right mandate, resources and tools to get the job done.

And it's not something that needs to be, or should be managed single-handed. Communication, cooperation and collaboration are all fundamental in ensuring an agency's privacy practices are well designed and well implemented. The most detailed policies will only be effective if those responsible for following them know they exist; understand what they contain, and why; and are aware of the consequences – for the agency and for them - of not meeting their obligations.

1. Get out there and be seen

- Make sure staff know who you are and your role in the agency - be a visible, constant and trusted presence who acts to champion privacy in all areas of the organisation.
- Make it easy for people to get hold of you if they have any concerns; questions, or want to report an incident or a breach.
- Make it known you can help staff get the privacy settings right so their goals can be met in a privacy-friendly way.

2. Know the risks

- Develop a data inventory and process map to document what personal information your agency collects and why, and by what legal authority.
- Know who has stewardship of personal information held, and why, and where it goes if it leaves your control.

3. Know your business

- Understand your agency's business and operating processes so you can work across silos within the agency.
- Utilise the expertise of your colleagues from all disciplines – you don't need to go it alone
- Socialise the organisational structure so staff know who does what and can get specialist advice from the right people at the right time.

4. Know your friends

- Build and maintain strong relationships with your fellow Privacy Officers in other agencies so you can support each other; share resources, and strengthen the privacy considerations in any cross-agency work programmes.
- Take time out to attend forums, seminars and networking events with your peers, e.g. the Privacy Officers' Round Table (PORT); the the Government Chief Privacy Officer's (GCPO's) regular forums, or the Office of the Privacy Commissioner's (OPC's) technology and Privacy Live seminars.
- Join the International Association of Privacy Professionals (IAPP); attend their conferences; make use of their published training materials, and consider completing an internationally accredited IAPP certification.

5. Do the ground work

- Adopt a 'privacy by design' approach to embed privacy safeguards throughout the life-cycle of all initiatives.
- Require a privacy threshold assessment for all new projects, and a Privacy Impact Assessment for all significant policy development work or programme changes.

6. Spread the load

- Make privacy a team effort by ensuring all business units and operational arms communicate regularly, rather than working in isolation.
- Help managers develop team KPIs and individual performance measures that support good privacy practice across the agency.

7. Spread the word

- Ensure all the agency's privacy policies and procedural documents are readily available to all staff and contractors.
- Prepare privacy-themed blog-posts or short, regular messages for all-staff newsletters or online message boards to give staff regular tips and advice and keep privacy front-of-mind in their daily activities.
- Visit team meetings to put a face to the job title and talk about the specific privacy issues facing staff day-to-day.

8. Provide the tools for the job

- Develop ongoing, regular privacy training to help employees understand how privacy considerations are relevant to their roles and responsibilities.
- Regularly review and revise training to reflect changes in your agency's operating environment and procedures.
- Ensure privacy is not just a 'box-ticking' compliance exercise but is enshrined in policies, procedures, and practice.
- Send out regular, role-focused reminders so knowledge stays fresh, and work with HR to update training if staff change roles.

9. Keep everyone informed

- Report regularly on agency performance – both to the ELT and to staff generally - to raise awareness and get support and buy-in for continuous improvements.
- Work with a Privacy Champion on the Senior Leadership Team so your voice is heard consistently and regularly at executive level.

10. Don't shoot the messenger when things go off-side

- Have an easy to understand and readily accessible incident response policy and clear processes for breach reporting.
- Address breaches promptly and report to management, and to staff, on issues arising and any remedial action taken.
- Be accessible and be approachable, and foster a 'no-blame' culture so staff are comfortable reporting mistakes.
- Encourage staff to see 'near misses' as 'good saves' – possible problems identified early are probably problems prevented.
- Make sure staff know their Privacy Officer is there to help and is only a phone call or email away.
- And if **you** have any questions – call GCPO or OPC – they're there to help and only a call away too!