

Session Outline

Session 3A: Privacy and Working Offsite – October 15, 2009 1:30 to 2:45pm

- a. Situations in which organizations consider off-site work
 - i. Financial savings
 - ii. Reduced office space
 - iii. Employer/employee flexible working environments
 - iv. Working in community
 - v. Working on the road while travelling
 - vi. Contractual/temporary arrangements

- b. What are the issues?
 - i. Risks to Privacy & Security
 - Loss/theft/unintended access
 - Info in transit – personal vehicles, public transportation, couriers/mail service
 - Infor in homes/other insecure locations
 - Infor on unprotected equipment/devices

 - ii. IPC case examples
 - Medical transcriptionist computer sold in second hand store
 - Medical records stuffed in car bra
 - Stolen laptops

- c. What does PIPA require?
 - i. Section 34
 - ii. What are “reasonable security arrangements”?
 - iii. Privacy risk assessment and mitigation

- d. Reasonable Practices of a Diligent Organization
 - i. Policies and procedures
 - Fundamental Code of Conduct or confidentiality policy
 - Specific policies on information protection – USBs, laptops, couriers – depending on nature of information and acceptable risk practices
 - Policies or guidance on what can/cannot be removed from main premises
 - Contractual wording for temporary/contract staff
 - Specific policy for employees who work from home
 - Whether the company provides equipment or not will influence many of these policies

- ii. Privacy Officer
 - iii. Training and awareness
 - iv. Monitoring and oversight
 - What may be practical? Some IT capabilities may be available
- e. When Bad Things Happen to Good Organizations
- i. Incident response procedure
 - ii. Consider report to privacy commissioner
 - iii. Complete risk assessment
 - Likelihood information can be accessed
 - Risk of harm based on nature of information
 - iv. Key Steps in Responding to Privacy Breaches
 - v. Commissioner investigation