

Accountability in a Page

Essential Elements (Galway Paper)

- Organizational commitment to accountability and adoption of internal policies consistent with external criteria
- Mechanisms to put privacy policies into effect
- Systems for internal, ongoing oversight and assurance reviews and external verification
- Transparency and mechanisms for individual participation
- Means for remediation and external enforcement

Common Fundamentals (Paris Paper)

- Policies
- Executive oversight
- Staffing and delegation
- Education and awareness
- Ongoing appropriate risk assessment and mitigation
- Program assessment and validation
- Event management
- Internal enforcement
- Redress

Common Program Elements

- Corporate privacy policies
 - Based on the law plus corporate values
 - Linked to corporate governance structure
- Mechanisms to put policies into effect
 - Processes to assess the privacy risks created
 - Training linked to tools
 - Event management
- Strong privacy team oversight
- Internal validation process
- Metrics that are shareable