

## PRIVACY READY CHECKLIST



- 1. Appoint a responsible person to do an audit:**
  - what personal information is collected?
  - For what purpose?
  - Under what conditions?
  - How is it collected? Consents? Full informed consents?
  - What is it used for?
  - Where is it kept?
  - Who has Access? Need to know?
  - What security measures are in place?
  - Is the information disclosed to third parties? To Whom?
  - Any outsourcing of work where third parties need to sign confidentiality covenants in order to be contractually bound to your policy?
  - When is the information disposed of? How?
  - Has the person to whom responsibility is delegated got the clear authority to oversee the handling of practices of the business and the information and people?
  - What are the current practices
  - What procedures can be implemented for ongoing monitoring of compliance?
  
- 2. Review the Audit results and have Management ask the following questions:**
  - Do we have adequate resources allocated to carry out policy?
  - What policy is in place?
  - How are our policies and procedures communicated to our employees?
  - What training in handling personal information?
  - Are the appropriate forms and documents fully developed, eg. consents.
  
- 3. Be Accountable. Manage the risk of improper disclosure:**
  - Identify the purpose for collecting the information;
  - Obtain consents
  - Limit collection of information
  - Limit use, disclosure and retention;
  - Ensure accuracy;
  - Provide adequate security;
  - Make privacy policies readily available eg. post it on your website

- Provide access to individuals to review the information you have on them
- Enable persons to challenge your compliance initiatives. Encourage feedback



**4. Be aware of and give highest priority to the High Risk Areas:**

- Health information
- Human resources. Individual employees have the right to see all notes on file about them and so care should be taken in what is recorded and/or disseminated in any form.