The City of Seattle Privacy Program

A PRINCIPLES-BASED APPROACH TO INCORPORATING PRIVACY PRACTICES INTO OUR DAILY OPERATIONS
City of Seattle Privacy Concerns

Public perception about new technologies

Wherever personal information is collected: classes to pet licenses to P-Patch applications...
City’s role in privacy

The City of Seattle has an obligation to maintain the public’s trust in how we collect and use their personal data.

Today our practices and commitments vary widely:

• Few explanations about when we collect or how we intend to use information
• Inconsistent data handling practices
• Retention policies not consistently observed
• Use of third party services that have practices inconsistent with our expectations
Program Outcomes

MISSION
To build public trust about the use and management of personal information.

DESIRED OUTCOMES
• Public understands how the City will use their data and trusts the City will honor their commitments
• Departments know what data they possess, classified it and protected it appropriately, and know their commitments
• Departments use data in accordance with their commitments
• Departments follow the appropriate retention schedule
• Departments share data with third parties in accordance with commitments and the City’s principles
Privacy Initiative: September 2014-Today

Executive request to address privacy for the City

Privacy Advisory Committee

External and Internal Workgroups convene

City IDT

Result: Citywide program

Privacy Program

Mayor

CTO

City Council
Deliverables

<table>
<thead>
<tr>
<th>Privacy Principles</th>
<th>Privacy Statement</th>
<th>Privacy Program</th>
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<tbody>
<tr>
<td>“Privacy Bill of Rights” ethical approach to inform all current and future technology and business process policies and standards</td>
<td>Comprehensive, One-City statement to address: • Data gathering • Handling/sharing • Access • Retention</td>
<td>• Privacy Toolkit • Privacy Review process • Program and staffing recommendations • Awareness Training</td>
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<td>Completed February 2015</td>
<td>Completed July 2015</td>
<td>Introduction: August 2015</td>
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Privacy Program

- Policies
  Obligations & Commitments

- Resources
  Self-service
  Toolkit
  Training & Awareness

- Expertise
  Department & Program

- Process
  Privacy Reviews
  Monitoring
  Reporting
What do departments need to do?

Incorporate the Privacy Principles in every project and operation that involves Personal Information.
How will we support you?

Policies:
- Principles
- Statement
- Policy

Expertise:
- Privacy Champions
- Training
- Counsel

Resources:
- Toolkit
- Program Manager

Review:
- Self-Service Assessment
- Threshold Analysis
- Privacy Impact Assessment

Accountability:
- Monitor Compliance
- Report to Mayor and SCC
Department Obligations

ADHERE TO THE PRIVACY POLICIES

1. Minimize Collection
2. Provide Notice
3. Legal Review
4. Review Security
5. Delete or De-identify

FOLLOW THE PRIVACY REVIEW PROCESS

Self-Assessment
Is it Personal Information? Can we use the Toolkit?

Privacy Threshold Analysis
Low/medium risk? Privacy Champion review?

Privacy Impact Assessment
Privacy Review Process

1. Are you collecting personal information?
   - No: No further action/store questionnaire
   - Yes: Is this Low/Medium/High Risk?
     - Low: Work with Privacy Champion and use Toolkit resources
     - Medium: Work with Privacy Manager to create a mitigation strategy
     - High: Council Action

   - Council Action:
     - Legal review
     - Public input
   - Post PIA results for public review
Further Implications

Conduct data inventory: Review applications, documents, processes for personal information collection

Include Privacy Principles early: Incorporate Principles in business process design and review

Accountability: Work with Privacy Champion to document and follow the departmental privacy review process

Accuracy: Determine processes to update information accuracy
Program Rollout Timeline

**Aug-Sep 2015: Introduce**
- Mayor review and Council briefings
- City business leadership briefings
- Departments review program and policies
- Champions identified 9/30

**Oct-Dec 2015: Launch**
- Program Launch
- Statement and policies in effect
- Toolkit and website available 10/1
- Champions meet and organize

**2016: Operationalize**
- All Champions in place Q1
- New projects under review process
- Employee training complete 3/31
- Depts. assess legacy operations

**2017: Refine**
- Annual training
- Program Compliance 12/30
For more information

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Online resources:
- Inweb site: Privacy Program
- SharePoint site: Privacy Toolkit
- Email: Privacy@Seattle.gov