

# Privacy Program Roles and Responsibilities

## Overview

In order to be successful, a Privacy Program needs a broad base of support throughout an organization. This document provides guidance to facilitate this through the implementation of a departmental Privacy Champion program, providing support to the Privacy Program Manager.

## Privacy Program Staffing

The Privacy Program is currently led by a Privacy Program Manager and would be supported at the departmental level by Privacy Champions. Under this model, the Privacy Manager provides full-time functional support for the City's privacy obligations, including the creation of policy and standards, development of training and awareness programs, oversight of privacy reviews and incident response coordination. Privacy Champions provide departmental support for privacy related issues. They also assist in determining the issues that should be escalated to the Program Manager. Department leadership is responsible for making the appropriate staffing decisions to fulfill the Champion role. More details about these roles and responsibilities are provided below.

## Privacy Champion Role

The Departmental Privacy Champion will provide departmental support for incorporating the Privacy Program objectives into departmental business systems and processes. The Champion is a departmental resource familiar with the objectives and tools of the Privacy Program. This responsibility is designed to be a part-time supportive function that is in addition to an employee's job responsibilities.

The departmental Privacy Champion will provide support for privacy related issues that may be resolved at the departmental level. This support includes:

- Handling basic inquiries, escalating as needed to Privacy Program Manager
- Conducting and signing off low-risk reviews
- Facilitating effective reviews of higher risk issues by validating response appropriateness in privacy assessments, participating in the actual review with the Privacy Lead/Manager as needed, and ensuring all remediation items are addressed and approved
- Completing training appropriate to the risk of assigned reviews and inquiries:
  - Required: Online training/awareness
  - Required: Privacy Program and Tool Orientation
  - Optional: CIPP/US through IAPP (online or in-person)
- Actively participating in privacy meetings and Champ programs for their department to build awareness about privacy

## Privacy Program Manager

The Program Manager role is a full-time function, providing leadership for the Privacy Program. In the context of the Champion Program, the Program Manager's responsibilities include the following:

- Managing the Citywide Privacy Program
- Providing training and oversight for Privacy Champions
- Leading an IDT to develop privacy policies and program support
- Working with the CTO and Mayor's Office as necessary to support legislative activities related to privacy
- Leading a multidisciplinary effort to develop Privacy Standards
- Working with the Compliance Office and governance groups to implement and enforce standards and practices
- Developing and managing training and awareness program
- Conducting Privacy Impact Assessments
- Coordinating departmental privacy incident response
- Internal and external legal consultation