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Centre for Information Policy Leadership
HUNTON ANDREWS KURTH

What Good and Effective Data Privacy Accountability Looks Like

Mapping Organisations' Data Privacy Practices to the CIPL Accountability Framework

| A project and report by the Centre of Information Policy Leadership (CIPL)

Overview

What is accountability

Accountability is globally recognised as a key building block for effective data privacy regulation and its corresponding implementation. It means that organisations: (i) take steps to translate data privacy legal requirements into risk-based, concrete, verifiable and enforceable actions and controls through the implementation of comprehensive data privacy management programmes (DPMPs); and (ii) are able to demonstrate the existence and effectiveness of such actions and controls internally and externally.

What is the CIPL Accountability Mapping project

CIPL has mapped organisations' real data privacy practices to the CIPL Accountability Framework to provide concrete evidence of accountability implementation, and how it is demonstrable and enforceable.

17 organisations of various sectors, sizes and regions participated in the CIPL accountability mapping

46 case studies illustrating best in class practices implemented by organisations across seven core accountability elements

" If you're doing privacy just for compliance, you've already failed. Privacy is an ethical responsibility and business imperative.

— Harvey Jang, Vice President & Chief Privacy Officer, Cisco

The CIPL Accountability Framework

CIPL has worked extensively on accountability in the digital world and has been advocating for its uptake and implementation by organisations and regulators around the globe.
The CIPL Accountability Framework is based on seven core accountability elements.

Top 10 common trends

Accountable organisations:

1 View accountability as a continuous internal change management process

2 Consider the CIPL Accountability Framework as an ideal baseline for their DPMP

3 Recognise accountability as a business topic and enabler of innovation and sustainability

4 Realise business benefits and efficiencies from accountability

5 Embrace accountability both as a controller and as a processor

6 Have senior leaders who recognise the importance of "tone from the top" and lead by example

7 Scale DPMPs to different sectors and types of business

8 Proactively manage data privacy risks and adopt a risk-based approach to their DPMP

9 Are familiar with accountability frameworks as they use similar frameworks in other compliance areas

10 Are driving global convergence in data privacy laws and best practices through a single DPMP

Examples of accountability practices - case studies

The CEO of an organisation added data privacy as the **No.1 priority for all its employees in 2020**, measured by specific KPIs. Some teams have been directed to spend a minimum of **30% of their annual resources on data privacy**. In the previous year, 2019, data privacy was made a priority for all engineering teams.

Business lines are responsible for implementing an organisation's DPMP. Activities related to the programme are captured in an **operational privacy risk register**, leading to the drafting of risk statements. Responsibilities for these risks are assigned to senior people within the business, who **report back regularly on 25 KPIs**. The reports feed the annual privacy plan of the organisation.

Click here to access the full CIPL Accountability Mapping Report

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