

# Centre for Information Policy Leadership

Quarterly Report: September - December 2013

## Message from the President:



Dear Centre Member,

Happy New Year, and I hope you celebrated the start of 2014 in good spirit with family and friends. With the start of the new year, we are launching a quarterly Centre Report as a regular communication to Centre members to keep you up-to-date with Centre activities in the previous quarter and highlight upcoming projects, events and dates for your calendar.

—Bojana Bellamy

## I. Highlights from September–December 2013

### DPO Project

- Launched a project on [“Addressing the Challenges of a Changing Role: An exploration of the dynamics impacting the role of the Chief Privacy or Data Protection Officer”](#) with a breakfast meeting at the International Privacy Commissioners Conference in Warsaw at the end of September.
- Published a discussion paper on [“The Role and Function of a Data Protection Officer in the European Commission’s Proposed General Data Protection Regulation”](#).
- Published the following discussion papers and documents at the second DPO workshop in Brussels in December:
  - [“The Role and Function of a Data Protection Officer in Practice and in the European Commission’s Proposed General Data Protection Regulation”](#) — Report on DPO Survey Results of practising DPOs from a range of industry sectors and a variety of geographical locations
  - [DPO Brussels Workshop II PowerPoint](#)
  - [DPO Requirements Under Selected Data Privacy Laws Comparative Table \(Revised and Final\) 2](#)
  - [Comparative Table of Analogous Roles](#)

### Cybersecurity Project

- Hosted four cybersecurity briefings with external speakers:
  - Implementation of President Obama’s Executive Order on Improving Critical Infrastructure Cybersecurity, 19 September
  - EU Cybersecurity Proposals and their Potential Impacts, 17 October
  - US Government Information Sharing Programmes, 21 November
  - Internet of Things, 13 December

## Other Activities

- Hosted European Discussion Group in Brussels on “Anonymous Data — Exploring the Evolving Definitions, Requirements and Approaches to Keeping Personal Identities Private”. Speakers included Billy Hawkes, Ireland Data Protection Commissioner; Iain Bourne, UK Information Commissioner’s Office; Stefano Fratta, Head of Corporate and Legal Affairs, Telefónica; and Digital Professor Vincent D. Blondel, Université catholique de Louvain.
- Submitted Centre [response](#) to the UK ICO Consultation on the Privacy Impact Assessments Code of Practice.
- Submitted Centre [comments](#) in response to the National Institute of Standards and Technology’s Preliminary Cybersecurity Framework.
- Held a Latin America Discussion Group teleconference to discuss the latest developments in Latin America, including updates on Brazil, Mexico and the Ibero-American Data Protection Conference.

## II. New Flagship Project

### Privacy Risk Framework and Risk-Based Approach to Privacy

This year the Centre is launching a key, flagship project on Privacy Risk Framework and Risk-Based Approach to Privacy. The project will explore what is really meant by the increasingly fashionable concept of taking a more “Risk-Based Approach to Privacy”. Many of the issues arise naturally and inevitably from the Centre’s pioneering work on Accountability, but so far remain largely unexplored.

As the pace of technological change out-strips conventional thinking, a risk-based approach should improve the ability of privacy officers and businesses to take a structured approach. By assessing the data privacy implications of new products, services and other activities from the perspective of possible negative impact on individuals, the aim should be to reduce the likelihood of serious harm.

The results are likely to be reflected in well-targeted privacy programmes and other safeguards. A new consensus on a risk-based approach also should help regulators fix their priorities for interpreting and enforcing the rules, and give businesses a better idea of what to expect and how best to avoid regulatory trouble. For the longer term, the project hopes to generate materials that will help policymakers and legislators to identify desired outcomes and shape rules for the future which are more effective and less burdensome.

### Project Timeline for 2014

January	Project launch, steering committee set-up and calls with Centre members to brainstorm and seek input
February	Completion of initial discussion paper
5 March	Session at IAPP Summit, Washington, DC
20 March	Hold workshop in Paris with key stakeholders
29 April	Pre-conference Seminar at IAPP Data Protection Intensive, London
May	Publication of our Phase I Discussion Paper
November	Hold workshop II

### III. Upcoming Events and Reminders

7 February	First Friday Teleconference
10-13 February	Centre delegation visit and conference presentations with Hong Kong Privacy Commissioner and Singapore Data Protection Commission
20 March	Risk Framework Project Workshop, Paris
March	Complete DPO Project and issue final report and recommendations

### IV. Membership Benefits

We work with members around the globe to develop and advance the next generation of information and privacy laws in order to help organisations create best information practices and help members anticipate privacy risks.

**We help policy executives, corporate lawyers and business leaders:**

- anticipate and resolve complex privacy and security problems by building stronger data privacy practices and creating interactive relationships with stakeholders;
- develop tools and solutions through peer relationships with other senior policy leaders and outside experts; and
- influence future standards and laws.

We achieve our goals through focused industry discussion groups on various information policy topics, white papers, updates, published articles, roundtables, retreats, and other briefings and discussions.

**Key features of membership include:**

- one-day annual executive retreat on strategic privacy and policy issues;
- monthly teleconferences on global policy and legal developments;
- US, Asia, Europe and Latin America discussion groups and workshops to evaluate new issues and challenges;
- capacity-building workshops and policymaker education dialogues and visits;
- opportunities to participate in Centre-coordinated discussions with regulators around the globe; and
- advisory support and access to the expertise of a Centre leader for strategic guidance on the development of global information management programmes.

#### Member Spotlight

We welcome and thank our newest members:

- Novartis International AG
- Richemont