



November 3, 2014

Purpose

This initiative will strengthen the City’s privacy practices in response to community, City Council and Mayor’s Office concerns. By engaging City department stakeholders responsible for data collection and use, and privacy leaders in the Seattle area, the City will develop a City-wide privacy statement and an approach to facilitating consistent compliance.

Completing the approach described below will provide the public with greater transparency into the City’s data collection and use practices, thus building trust in the City’s ability to leverage innovative new technologies that involve collection of new or additional data.

Approach

- Stand up an interdepartmental team (IDT) comprised of representatives from DoIT, SPD, SCL, SFD, Library, SDOT, Law, and the Mayor’s Office to help envision and drive creation of City-wide privacy program.
- Appoint a Privacy Advisory Committee comprised of no more than nine academic and community privacy thought leaders to advise the IDT. The Committee will develop privacy principles that guide the creation of privacy statements and other deliverables. In addition, the Committee will provide direct support as requested by the IDT.
- Develop privacy statement and other governance documents to facilitate department awareness of and compliance with privacy requirements.
- Complete a current state assessment of key departments to assess compliance with the proposed privacy statement.
- Propose an appropriate structure for an ongoing privacy program within DoIT that would help maintain the privacy policy and establish ongoing data governance.

Deliverables

- Privacy Principles. Statement of approach about privacy in the City of Seattle.
- Privacy Statement. Establishes minimum practices for data collection, use, notice, and related practices.
- Privacy Toolkit. The Kit will include guidance documents, including a data collection planning checklist, lightweight impact assessment, and standards to drive awareness and privacy statement compliance across departments.
- Privacy assessment results. This would include remediation plans to help departments update their practices.
- Privacy program structure. Proposed structure for supporting privacy efforts and compliance moving forward.

Proposed timeline

October 2014	November-December 2014	January-March 2015	April-June 2015
<ul style="list-style-type: none"> • Establish IDT, develop charter • IDT proposes Privacy Advisory Committee membership 	<ul style="list-style-type: none"> • Privacy Advisory Committee meets, develops proposed principles and recommendations governing creation of privacy policy, toolkit, and a privacy program • IDT begins drafting privacy statement 	<ul style="list-style-type: none"> • IDT finalizes privacy policy • IDT drafts Privacy Toolkit, including standards and privacy impact assessment methodology, and proposed privacy program • DoIT includes in supplemental budget request staff or assessment related costs 	<ul style="list-style-type: none"> • IDT finalizes the Privacy Toolkit • Vendor selected and perform current state privacy assessment. Develop remediation plans with departments. • Develop and implement interim plan for privacy program staffing in advance of new budgeted positions.

