SIX WAYS
Privacy AwarenessTraining Will Transform Your Staff

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When I first meet with a client's staff, I tend to ask, "What does privacy mean to you?" Generally, the room becomes quiet. Maybe it is because it is an unnerving way to start a discussion. After all, here is a privacy professional asking what privacy means; no one expects a pop quiz. Or maybe it is because the meeting attendees have not given much thought to the subject.

As an organization, you have obligations to your customers and other stakeholders to protect their personal information. Some obligations are regulatory, some by statute, some by contract, and some simply due to public expectations. Below are six ways that establishing a privacy awareness training program will help your team to think about privacy and meet these obligations.

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1. Establishing a common understanding of privacy

Privacy, I suggest, varies by culture and generation. For example, people with different cultural backgrounds have their own ideas about what can be made public and what should remain private. Simply looking at what is considered sensitive personal information in different jurisdictions around the world will confirm this.

Now, consider the varying backgrounds and ages of the members of your organization. Each team member has their own perspective on what personal information it is safe to share and with whom to share the information.

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Within an organization, however, there needs to be a common understanding of privacy, as a concept, and how to protect personal information. If the staff is left to their own privacy perspectives, your customer, employee

and other stakeholder personal information will not be collected, processed or protected in a uniform way, putting the organization at risk. After all, the organization is held accountable by its stakeholders and regulators for the proper handling of the information.

Privacy awareness training can provide a communal privacy definition and framework for handling personal information. The training establishes the value an organization puts on the protection of personal information, what commitments have been made to customers, and how proper behavior will support organizational goals and objectives.

2. Reducing human error

People make mistakes. Sometimes, however, when people are trying to do "the right thing" they make what I call an "intentional mistake," behavior that varies from organizational expectations. While determining the root cause of intentional mistakes, it is not unusual to hear that the person involved didn't know of a policy or procedure that defines the proper protection of personal information.

The increased knowledge of proper policies and procedures provided by privacy awareness training will encourage staff members to properly handle personal information. More importantly, even if individuals on the staff don't remember exactly the details of the policies and procedures, team members will become curious enough to find the proper policy or procedure or they may ask a co-worker for assistance.

3. Considering privacy up front

When creating new applications or processes, it is important to collect all the requirements early in the development process. The later in the development cycle new requirements are introduced, the costlier it is to address them.

Optimally, when applications or processes are being discussed, someone from the privacy team should have a seat at the table. Taking advantage of a framework such as Privacy by Design will ensure this occurs. Absent such a framework, someone on the development team needs to remember to invite a privacy representative or the team needs to take on the development of the privacy requirements independently. Privacy awareness training can be used to discuss how the privacy team will support development efforts.

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Privacy awareness training can also provide teams developing new applications or processes with a foundation to recognize when personal information being used may be outside of accepted organizational norms. This in itself may cause the team to adjust their use of personal information or seek the help of a privacy specialist.

4. Improving customer interactions

Regardless of whether your customers are consumers or businesses, I am sure you collect a lot of personal information from them. Depending on the volume and type of personal information collected, your customers may question why you need so much data. Familiarizing an organization with the concept of data minimization, privacy awareness training can provide guidance to the staff about when it is appropriate to collect personal information. By reducing the information you are collecting to what is truly needed to complete a transaction or process, your customer interactions may be perceived as less intrusive.

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Additionally, privacy awareness training encourages your team members interacting with customers to be more respectful of the customers' privacy. Trained team members become more sensitive as to what to ask and how to ask it. They also become more knowledgeable as to why any requested information is needed.

5. Expanding the privacy office's eyes and ears

Privacy professionals are, generally, a scarce resource in most organizations. When you consider the number of initiatives an organization undertakes, the compliance review requirements, and the need to address inquiries from stakeholders, the privacy office workload can quickly overtake the privacy office staff's capacity. Privacy awareness training can assist in alleviating some of this workload.

A privacy-aware organization can rely on employees to address some privacy concerns independently. In addition, the trained staff is privacy knowledgeable enough and self-aware enough that when something does not seem right, they raise their hand to get the privacy office involved.

Consider a brainstorming session where new initiatives are being discussed. Chances are that a privacy professional is not involved. As

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ideas are being bandied about, a privacy-aware team will be able to identify potential privacy risks as each idea is considered. This brainstorming group can then have a meaningful, succinct conversation with your privacy team discussing risk mitigation for the ideas they wish to move forward with.

6. Changing conversations

The ultimate goal for privacy awareness training is to change conversations. To change them from ones where privacy is an afterthought to ones where privacy is a key consideration. Privacy awareness training will move discussions from "wouldn't it be great if we …" to include how customers will react to the new use of personal information.

If exposed to privacy awareness training, the C-suite level conversations will change as well. I recently worked with a leadership team that met periodically to discuss privacy. Then, the organization decided to invest in privacy training for the headquarters staff, including the members of the "C" suite. While the training events were occurring, leadership ramped up the schedule to meet weekly to discuss privacy.

When the training concluded, the privacy officer attempted to reduce the frequency of the meetings back to the pre-training schedule. His peers objected, requesting to keep the meetings at the new, increased frequency.

Why? These are the conversations that are driving businesses today: How can we make smarter decisions about which customers want which products without invading their privacy and damaging our relationships with them? This is what privacy awareness delivers.