

IN SEARCH OF A PRIVACY OFFICER

TWENTY QUESTIONS

Case Study: Yikes! That could have been us.

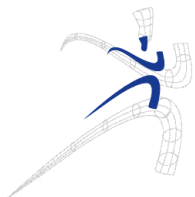
The Vice President, Corporate Resources ended the telephone call on her almost invisible wireless headset and paused to gaze out the window. Her thoughts were churning at high speed. A trusted colleague at Acme Corp. had just briefed her on the results of their recent privacy review. Acme had just suffered a public relations nightmare after some confidential information on their employees and their clients had been found where it shouldn't have been. As her colleague highlighted the various recommendations for change, the VP realized that virtually every single one of them could apply to her company as well. Reflecting on the conversation and only barely registering the traffic in the street below, a staccato burst of thoughts stacked into the mental queue: "How much is our organization at risk? What do our policies not cover appropriately? What should I do to get this on the executive agenda? Do we have the right person to spearhead the assessment and improvement program? What is a reasonable response? Who would make a good Privacy Officer?"

She activated her laptop and started to organize her thoughts into action. Her next meeting with David (the Vice President of HR) was only two days away. Maybe it was time to float some trial balloons before the month end executive team meeting.....

The Need

Effective, January 1, 2004 Canadian organisations will need a new titled person in their organisation; a Privacy Officer. This person will need to command the respect of many layers of stakeholders and work hard to adjust the culture and processes to cope with the demands of the new privacy legislation (not to mention some of the uncertainty). Not only must you comply with the legislation, you also need to build in the protective polices, procedures and tools that will guard against those who would hope to gain from testing the legislation with you through the courts. Your Privacy Officer will need to be able to use the tools of training, policies, processes and technology.

The right person for the job needs to be an agent of change. Yet, the changes must be done at a pace and style that fits the existing organizational culture and available tools. Revolutionary change itself may represent too big a risk. Yet, your organisation should be seen to be coping responsibly with this issue to hang on to key clients.



We are now faced with new and unprecedented need for privacy and protection of people related data. As a result, a new set of requirements for your computer systems must be put on the table. The challenge is to become more sensitive to privacy concerns and implement "reasonable person" responses to the many risks. The work of your organisation's privacy function should be driven by the degree of risk that the business is willing to take. A healthy and structured handling of the privacy issue may take time, patience and the right behavioural model (for example, visible leadership support).

Companies and individuals usually do business with organisations they respect and appreciate. For the future, there will be increasing pressure to be seen to sensitive and responsible to such issues as privacy and business ethics.

In addition, the right privacy person can play an important part of the executive team. To achieve this requires a good "fit". The following is a set of interview questions that has been designed to help assess how a potential Privacy Officer candidate will function in your business environment. A mature business response to these issues will tend to indicate whether the candidate is a business manager first and a technical or policy guru second. The wrong answers might indicate you are interviewing Privacy Wimp or a potential Privacy Nazi.

Interviewing Questions

These are "seed" questions to open a discussion on each subject. In most cases, the questions are open-ended to encourage explanation answers. In some case, the best answer may be clarification questions or rhetorical observations from the candidate.

Change Agent

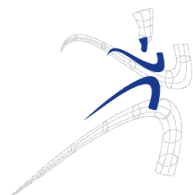
Name three specific projects in past roles where you were required to introduce changes in culture and behaviour? Describe your approach to building privacy recommendations and how you would gain support / acceptance for their implementation.

Management style

Describe instances of your management style preference in achieving delivery of urgent new business processes. How has approach this been received by your staff, your peers and others?

Communication strategies

Describe how you have communicated in past assignments? What were your reasons for these choices? How did test their usefulness?



Security

Describe your involvement in physical and electronic security in the workplace. How did you decide what levels of security to apply in what situations? What have you learned?

Compliance

Describe how you have implemented compliance in past assignments. Which ones were most successful and why? Which ones were least successful and why?

Stewardship

How would you like to be measured on your performance as the leader of a privacy staff function? How would you build these measures and put them forward?

Unions

Describe your experiences working in a union environment? Do you have a way of dealing with unions? How do you balance the "dual masters" issue (i.e., management requests in conflict with union objectives) and still get your job done?

Controlling work

Supply the best example of your approach to controlling the work of employees or contractors? Has this ever failed you and why? How about volunteers?

Business Cases

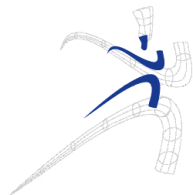
Describe your favourite two business cases that got you the funding and support you needed for important projects and how they evolved. How did they fit with the annual budgeting cycle? Did they involve capital expenditures or only operating expenses?

Vendor management

Describe two situations where you have hired external service providers in supporting internal programs of your firm? What did not work well?

Planning

Describe your approach to planning in a situation that had lots of unknowns? Planning for short term and long term?



Visibility

Illustrate with examples of how you have made your work visible to others?

Innovation

Supply your best example of innovation in your previous roles?

Selling

Describe a specific example of how you "sell" your favourite ideas?

Support

Illustrate with a couple of examples how you got the support you needed for key resources and initiatives? For what specific items would you typically seek peer support?

Motivation

Describe your best example of motivating busy people to pay attention to your project? How have you best motivated yourself?

Conflict

Explain your approach to resolving conflict between yourself and others with an example? Another example of conflict between conflicting needs? Describe an example of tension between seniors, one of which is your boss?

Crisis

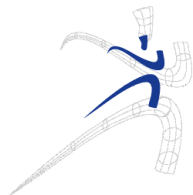
Illustrate with an example, what different or additional things do you do in a crisis?

Ethics

Describe how you have handled situations that tested your personal sense of business ethics or conflict of interest?

Negatives

What parts of your management skills have not worked and why? What have you changed?



References

Name your single best reference (for example, a successful project, a satisfied client) and describe why it was so successful? Name the single worst reference you might get and suggest some possible learning from the experience.

Experience

Describe your related experience and how this prepares you for the role of Privacy Officer?

Process

Outline briefly what you would do to find the quality and completeness of the privacy practises currently in place?

Challenges

What do you see as the three main challenges for our business in complying with the new privacy legislation? How would you handle these?

Clouds

Describe in literal terms where you see yourself in five years. For example, describe your surroundings, the attire and characteristics of the people around you, typical activities, the setting, and the facilities.

Maxims

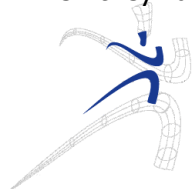
Do you have a set of principles that have worked for you? Describe the three most important ones and suggest why they work to support your success.

Consultants

Describe how you have worked with external consultants and what made it effective?
Describe how you have worked with internal consultants?

Responses

For most of the questions, the interviewer should look for management processes in the answers. Even dynamite consultants or experienced managers rarely know all of the answers. When they run out of "content" (i.e., the answers), they always have a "process" (a set of steps



that will eventually produce the answer or options). The best candidates ask tough questions and have the ability to craft observations and generalisations from their experiences. The good ones also have a ready supply of road-tested principles that help them through the tough situations that will always arise.

For younger candidates, the "cloud" question can sometimes provide an insight into the future career vision the candidate holds. Often, the vision changes as they proceed and some candidates have difficulty in sharing a concrete literal "picture" of where they would like to be. Alternatively, we have interviewed candidates that readily shared a vision that was highly incompatible with the job opportunity.

Conclusion

Recruiting for a new Privacy Officer is serious business. The chance of making a mistake is as great as the potential of finding the right person. The questions you ask in the interviews can make a big difference in getting closer to the best fit for this difficult new role. Take these questions, two hours of high energy and enjoy the best interview possible.

Ron V. Gilmore, CMC

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<http://www.gilmoreassociates.ca/contact.html>**

