

# Accountability 1.0 – Necessary But Not Sufficient

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# Summary

- Environmental Observations – the “governance & policy gap”
- Who we are and why are we here?
- A “view” of the risk profile threatening data driven innovation
- What is needed in a 21<sup>st</sup> Century Data World

# Essential Elements of Accountability

1. Corporate commitment to internal policies (codes of conduct) that link to external criteria – data protection law
2. Mechanisms to put those policies into effect, including identifying risk to individuals and mitigating those risks (privacy-by-design)
3. Internal monitoring to assure mechanisms work
4. Individual participation – transparency; consent (where effective)
5. Standing ready to demonstrate to a regulator on request, and remediation where necessary

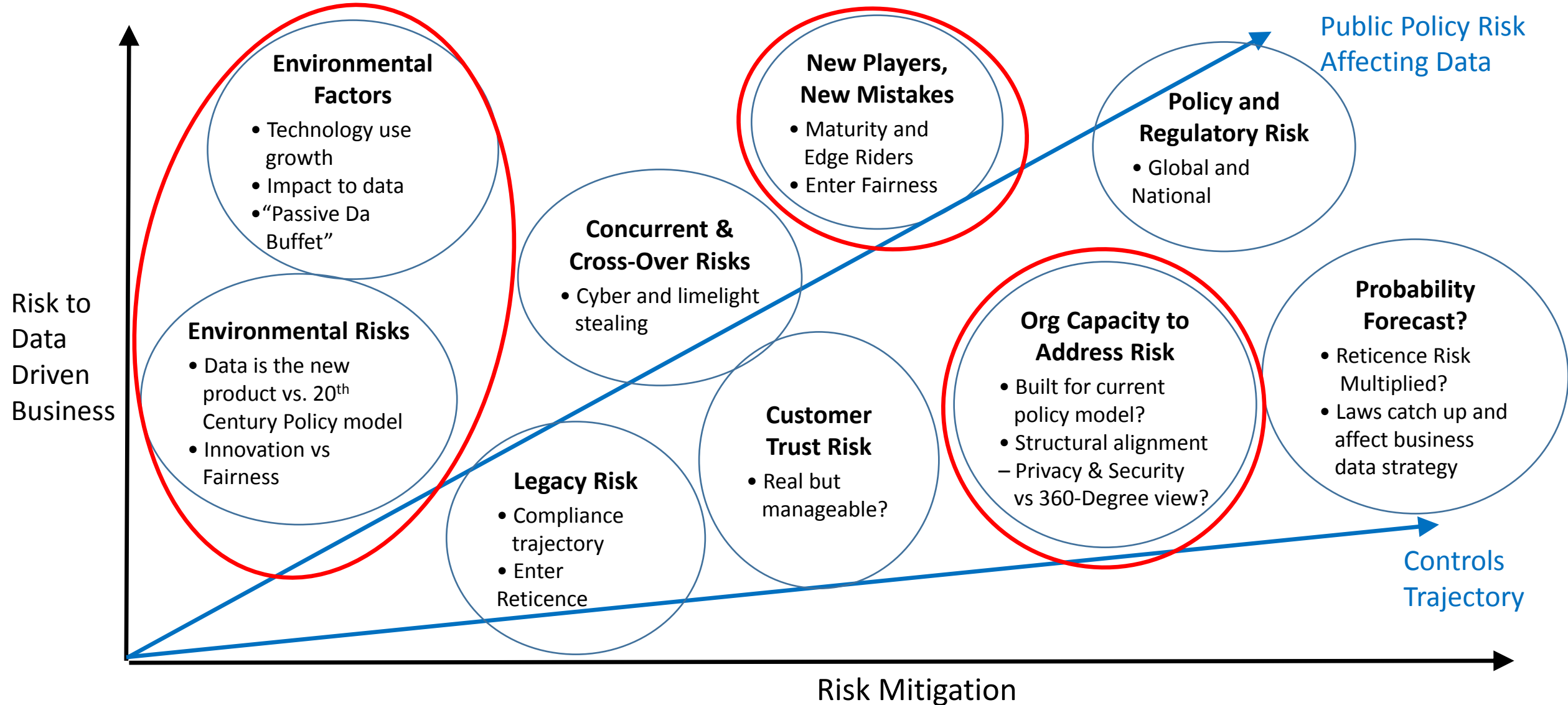


# Risk Problem Summary

Data-driven innovation and the organizations that are dependent upon it are at risk from an information governance vacuum and how policy makers and regulators might fill it.

The risk of having data and prohibitions on making innovative uses of that data is growing by the day creating regulatory risk, customer trust risk and reticence risk; information will simply not be used because decision drivers are unclear.

# Sustaining a Business Data Driven Strategy



# What To Do? – Compliance to Fairness

## Build Information Governance Accountability 2.0

### *Key Questions*

- What will business do to achieve “outcomes”?
- What does org capacity, capability, structure and tools look like?

### *Requirements*

- A tangible shift to a “values” based approach
- 360 view - “all” stakeholders and interests considered

# Values for an Ethical Frame

## Beneficial

- Sense of purpose
- Define the benefits
- Parties who gain benefit
- Risk-Benefit balance

## Progressive

- Materially better
- Measures
- Support innovation
- Consider risks

## Sustainable

- Legal basis/permissions
- Influence of model(s)
- Longevity of insights
- Ability to refine/correct

## Respectful

- Data origination/restrictions
- Context/Purpose
- Interests of all parties
- Expectations/Rights

## Fair

- Insights/Applications
- Inferences/Discrimination
- Labeling/Predestination
- Compatibility/Legal Basis

# Organizational Response – Accountability 2.0

- Requires a horizontal view of data and a 360 degree view of risk and benefits – balance?
  - Fairness; not just legal
  - PIA to “Information Impact”
  - Rethinking Individual Participation
  - New risk mitigations
  - Demonstrating Capability
- Roles need to broaden – CISO, CPO, CRO, ERM - org “matrix” vs “specialist” look like?
- What is the role of a “Data Governance Board”?
- If the inside process is changed how do you tell (and plan to tell) the story to outside stakeholders?



# Why?

- Reduce Regulatory and Public Policy Angst
- Increase Customer Trust and Participation
- Value Creation!

# To Reach Me

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## Resources

- [Information Accountability Foundation](#)
- [Big Data Assessment Project](#)