

# HORIZONTAL AUDIT OF PROTECTION OF PERSONAL INFORMATION by the Office of the Comptroller General

## MANAGEMENT ACTION PLAN

This action plan was developed by Library and Archives Canada as a follow-up to the Horizontal Audit of Protection of Personal Information performed by the Office of the Comptroller General.

Audit Recommendation	Management Action	Area Responsible	Expected Completion Date
<p><b>1.</b> Departments should ensure that delegation orders are updated and appropriately approved.</p>	<p>LAC has reviewed and updated its delegation of authorities under Section 73 of the Privacy Act.</p>	<p>Corporate Services</p>	<p>Completed</p>
<p><b>2.</b> Departments should ensure that roles and responsibilities are appropriately documented and should ensure that employees are aware of them and have the necessary tools to discharge their responsibilities.</p>	<p>A Privacy Management Suite (PMS) on the protection of personal information was reviewed and approved by Management Board. The PMS include: LAC Procedures for PIA and Privacy breaches, and Procedures Establishing and Managing Intellectual Access Conditions for Private Funds and Archival Collections. These identify roles and responsibilities for the protection of personal information.</p>	<p>Services Branch  Services Branch</p>	<p>Completed  March 31<sup>st</sup>, 2015</p>

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	Specific training will be developed and provided to employees with responsibilities related to the management of personal information.		
3. Departments should ensure that PIAs are considered and conducted appropriately when developing new, or substantially modified programs and activities.	LAC Procedures for PIA was developed and approved by the Management Board. This policy clearly addresses the roles and responsibilities for risk analysis related to the protection of personal information.	Services Branch	Completed
4. Departments should ensure that access rights are appropriate and effective for the protection of personal information.	<p>As part of Safety Week, a communication will be sent to all LAC employees on the accountability of stakeholders in the management and protection of personal information.</p> <p>Guidelines and Procedures will be developed to establish the responsibilities for managing access rights to LAC's different systems, including training.</p>	<p>Chief Information Officer</p> <p>Chief Information Officer</p>	<p>October 1<sup>st</sup>, 2014</p> <p>March 31<sup>st</sup>, 2015</p>
5. Departments should ensure that privacy notices comply with the <i>Directive on Privacy Practices</i> and the <i>Directive on Social Insurance Number</i> .	Not applicable to Library and Archives Canada		
6. Departments should ensure that all privacy breaches are managed appropriately. This includes documentation and reporting of	LAC Procedures for Privacy Breaches was presented to Management Board and approved. It establishes the procedures to follow in the event of a privacy breach.	Services Branch	Completed

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the breach and remedial actions taken to address it.			
<p>7. Departments should assess whether their monitoring mechanisms are appropriate for the size and complexity of the department's mandate and the risk associated with the personal information administered.</p>	<p>LAC will review its monitoring practices to ensure they are relevant and reflect LAC's size and complexity.</p> <p>Access to Information and Privacy reports will be presented to LAC's Business Operations Committee (BOC) and Management Board (MB) before being tabled in Parliament. This will also be a yearly standing item on BOC and MB agendas.</p>	<p>Services Branch</p> <p>Services Branch</p>	<p>March 31<sup>st</sup>, 2015</p> <p>December 31<sup>st</sup> – Annual basis</p>