



Kuma | Case Study

The County of Santa Clara, California Establishes Agency-Wide Privacy Program

The Customer

The County of Santa Clara, California, also referred to as “Silicon Valley”, is located at the southern end of the San Francisco Bay and encompasses 1,312 square miles and a population of nearly 1.9 million. They deliver the services and information its citizens need across numerous agencies and oversees programs for a multilingual, culturally diverse community.

The Challenge

The County issued a formal RFP in response to a recognition they needed to address their privacy practices and mature them further to ensure a current, comprehensive privacy program was in place utilizing industry best practices.

The Solution

To equip this client with a comprehensive privacy program and implement the program throughout the organization, Kuma provided a range of services, including:

- privacy program assessment
- privacy SWOT analysis
- privacy program development recommendations
- overarching privacy communication strategy
- workforce training and development plans
- data inventory and classification prioritization
- privacy incident response strategies

The Kuma team also delivered a series of assessment and recommendations reports and an actionable implementation plan to establish and administer a Privacy Office within a comprehensive Privacy Program.



CUSTOMER

The County of Santa Clara, California

SERVICE IMPLEMENTED

Privacy and Security Program:

- privacy program assessment
- privacy impact and risk assessment
- privacy program development recommendations
- overarching privacy communication strategy
- workforce training and development plans
- data inventory and classification prioritization
- privacy incident response strategies

RESULTS

- A holistic understanding of privacy practices throughout the multi-agency organization
- Actionable roadmap for sustainable governance structure
- Worked with County to hire first-ever Chief Privacy Officer
- Continued privacy risk assessments for specific agency programs

Privacy Program Assessment

A written assessment of findings and results of current privacy practices within specifically identified agencies was developed that included evaluation of agency governance, policies, training and awareness, data classification and information technology assets, and data breach preparedness. Each of these privacy program dimensions were assessed for organizational maturity, saturation, and performance to permit a repeatable and concrete evaluation methodology. Key findings and results were presented in the deliverable report.

Privacy SWOT Analysis

A County-wide assessment of current privacy practices was implemented and encompassed evaluation of County strengths, weaknesses, opportunities, and threats (SWOT) for privacy policies and practices within the greater Santa Clara County government, not limited to a specific agency. Traditional SWOT factors were segmented into internal and external influences that affect privacy program performance.

A high-level survey was designed to glean information from multiple County agencies to supplement the SWOT and was designed for distribution to agencies without particular expertise in, or identified staff with designated job functions within the privacy arena, to be brief and at a macro, high-level perspective. The survey also engaged additional agencies as the County was taking steps to stand up a County Privacy Office. An assessment of the strengths and weaknesses in the County's adherence to the Fair Information Practice Principles was also incorporated into the evaluation. Results and findings were presented in the report.

Privacy program development recommendations

A written report was created to provide recommendations to establish a county privacy office and privacy program including the governance structure, policies and practices, staffing approach, assessment of data locations and classification, legal regulations and contractual obligations, training and awareness program recommendations, incident response strategy, and proposed performance management of a privacy program. Organizational structure, including sample job description and organizational chart, plus an identified privacy framework were included in the recommended governance structure.

A training and awareness course was recommended for the workforce and the public, that included initial starting points for the program.

County Communications Plan

A County Communications Plan was provided as a comprehensive communication strategy for County leadership to use in socializing the development and implementation of a County Privacy Office with agencies and workforce members. A tailored Communications Plan, Communications Tool-Kit, and Audience Matrix were included in the set of deliverables for the County.

Organizational Change Management Plan

An Organizational Change Management Plan was developed that outlined steps to develop and implement a Privacy Office and Privacy Program within the County structure. The plan included milestones, a timeline, recommended resource allocation, including personnel and projected budget.

The Results

The client was able to utilize Kuma's expertise with privacy assessment and program development to objectively understand their current privacy practices within particular agencies and across the entire organization. Kuma provided an actionable roadmap for a sustainable governance structure and methodology for addressing critical risks while implementing a sustainable Privacy Program. The client currently has an approved job requisition for a Chief Privacy Officer, based upon Kuma's provided job description. Kuma continues to conduct privacy risk assessment services for specific agency programs.

Kuma

Kuma is a global privacy and security consulting company that provides progressive best practices for optimal success to every client, staffing each project with senior-level resources, and delivering influential thought leadership through strong industry relationships and quality partnerships.

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