

Fleming College

CAAT Job Evaluation System for Non-Bargaining Unit Employees

Ontario Colleges of Applied Arts and Technology

The Job Fact Sheet Questionnaire (JFS) is used to gather information for job evaluation purposes for the Colleges= Administrative Staff, Part-Time Support Staff, Part-Time and Sessional Academic Staff positions. Please read each section carefully before completing.

The Education and Experience sections are to be completed by the College according to the College=s recruitment standards.

Upon completion by an incumbent, the JFS is reviewed and, when necessary, adjusted by the position=s Manager and the Senior Manager responsible for the position. Any changes to the JFS are to be reviewed with the incumbent prior to evaluation. The JFS is then submitted to the appropriate College official for job evaluation purposes.

The JFS is not finalized until it has gone through the job evaluation process and the results have been confirmed by the College. A copy of the finalized JFS will be provided the incumbent for information purposes and as a job description.

POSITION IDENTIFICATION

Position Title: Privacy and Policy Officer
Position Number:
Pay Band: 9
Incumbent: VACANT
Location/Campus: Sutherland
Division/Department: Office of the President
Immediate Supervisor (title): Manager of Operations – President’s Office
Date of JFS: July 20, 2020
Last Evaluated: July 23, 2020

Type of Position:

- | | |
|--|---|
| <input checked="" type="checkbox"/> Administrative | <input type="checkbox"/> Part-Time Administrative |
| <input type="checkbox"/> Sessional Academic | <input type="checkbox"/> Part-Time Academic |
| <input type="checkbox"/> Part-Time Support | <input type="checkbox"/> Other |

I have read and understood the contents of the Job Fact Sheet (if completed by an incumbent):

Incumbent: _____

Date: _____

Recommended by:

Position’s Manager: _____

Date: _____

Approved by:

Senior Manager: _____

Date: _____

POSITION SUMMARY

Provide a concise description of the position by identifying its most significant responsibilities and/or accountabilities.

Reporting to the Manager of Operations – President’s Office, the Privacy and Policy Officer is responsible for the development, implementation and maintenance of a comprehensive privacy program to ensure that Fleming College is in compliance with applicable provincial, federal and international privacy laws relating to the collecting, maintaining and protecting of personal information.

The Privacy and Policy Officer is also responsible for assisting and supporting Department Heads with their departmental policy review, policy development and policy research including institutional best practices and legislative compliance. As required, the Privacy and Policy Officer will develop policies and operating procedures for the Office of the President.

The Privacy and Policy Officer works with Fleming College departments to ensure that requests made under the *Freedom of Information and Protection of Privacy Act (FIPPA)*, *Personal Health Information Protection Act (PHIPA)*, and where applicable the *General Data Protection Regulation (GDPR)* are responded to and managed in accordance to the respective legislation and Fleming College’s policies and operating procedures.

The Privacy and Policy Officer will collaborate with relevant Fleming College stakeholders in responding to reported/confirmed privacy concerns (i.e. breaches), file reports as required by legislation to the Information and Privacy Commissioner of Ontario (IPC), as well as prepare internal reports for circulation within the Fleming College community on lessons learned and recommended actions to prevent similar incidents from happening again.

The Privacy and Policy Officer will develop and lead ongoing education initiatives within Fleming College about protection of privacy obligations, breach avoidance and effective and secure records management and destruction. They will also work closely with Department Heads on information security and organizational initiatives that have privacy implications.

The Privacy and Policy Officer will coordinate Fleming College’s annual policy review. They will collaborate with relevant Department Heads and College stakeholders to ensure existing policies are current and compliant with overarching policies and relative legislation. They will identify existing policies which are redundant and recommend new policies for development.

KEY DUTIES

Provide a description of the positions key duties. Estimate the percentage of time spent on each duty (to the nearest 5%). Add an extra page if necessary.

Key Duties	% of Time
Administration of Access to Information and Protection of Privacy at Fleming College <ul style="list-style-type: none">Acts as the central point of contact for responding to and processing the College’s Freedom of Information (FOI) requests. Ensures compliance with legislative timeframes, accurate internal tracking (e-filing), appropriate payment processing, involvement of appropriate Department Head(s), and confirms responsive, or exempt, records.Interacts with FOI requestors on significant and/or complex (FOI) requests.Contacts and/or provides notification(s) to third parties involved in the requests, and internal Fleming College stakeholders to ensure both appropriate access to information and protection of privacy.	40%

<ul style="list-style-type: none"> • Working with Department Heads consults on the processing of complex FOI requests by leveraging critical thinking skills in deciding which FIPPA /PHIPA section(s) would apply for individual requests, researching into past rulings made by IPC on similar requests, consulting with relevant stakeholders and seeking legal advice when appropriate. Provides advice to Department Heads pertaining to access of information and exempt records under FIPPA and PHIPA. • Supports Department Heads with their investigations into internal and external reported privacy incidents (i.e. breaches) and policy violations within their department, and works in consultation with relevant Department Head(s) to addresses privacy complaints from internal and external parties. • Conducts and drafts post-mortem analysis reports, subsequent to major events, outlining root causes, lessons learned, and mitigative action(s). • Provides privacy related consulting services to College departments, offering insights into best practices by maintaining a broad knowledge of the latest privacy-related legislation, trends, issues and solutions. • Working with Department Heads, ensures the receiving, documenting, tracking, investigating and taking action on concerns / complaints concerning Fleming College’s handling of personal information. • Creates and prepares reports for the College’s Senior Management team, and submits the Statistical Analysis report to the IPC. • Maintain the College’s Access to Information and Protection of Privacy website. 	
<p>Policies & Procedures – Development, Review & Compliance</p> <ul style="list-style-type: none"> • Leads the development and management of privacy related policies, procedures and processes. • Leads the development and management of the Office of the President policies, procedures and processes. • Coordinates Fleming College’s annual policy review. • Develops templates and guidelines for policy and procedure development. • Maintains current knowledge of applicable international, federal and provincial laws and reviews College policies, procedures and processes to ensure compliance with relevant legislation. • Maintain the College’s Policy and Procedure website. • Provides guidance to Fleming College department to ensure that Fleming College maintains appropriate privacy and confidentiality consent and authorization forms, information notices and materials reflecting current organization and legal practices and requirements. • Working with Department Heads and relevant stakeholders, ensures that College departments have current, effective and secure personal information and/or personal health information and/or records management retention and destruction processes in place. 	40%
<p>Education, Training and Resources</p> <ul style="list-style-type: none"> • Provides training and develops assistive resources (i.e. guides and templates) to assist with College policy and procedure development. • Initiates, facilitates and promotes activities to foster information privacy awareness within Fleming College, including but not limited to: ensuring that timely updates are posted on the internal website; and planning and implementing ongoing campus activities to enhance privacy awareness. • Oversees, develops and delivers ongoing privacy training session and 	15%

orientation for employees throughout the year; creating and delivering presentations to the Senior Management Team; Deans, Chairs, Managers, Faculty, Support Staff and Union Executives.	
Other duties as assigned	5%
TOTAL	100%

TOTAL:

100%

1. COMPLEXITY - JUDGEMENT (DECISION MAKING)

Complexity refers to the **variety** and relative **difficulty** of **comprehending** and **critically analyzing** the material, information, situations and/or processes upon which decisions are based.

Judgement refers to the **process** of identifying and reviewing the available options involved in decision making and then choosing the most appropriate option. Judgement involves the application of the knowledge and experience expected of an individual performing the position.

Provide up to **three examples** of the most important and difficult decisions that an incumbent is typically required to make.

1	The incumbent must be able to work under a tight timeline to manage and lead activities among relevant stakeholders to respond to FOI requests, while at the same time apply business acumen when dealing with FOI requests from special interest groups to ensure that Fleming College acts in compliance with legislative requirements but without compromising Fleming College's interests in the process.
2	The incumbent receives a report alleging that there is a privacy breach. The incumbent must lead research, consultation and facilitation activities amongst all stakeholders required for gaining the required information to drive the decision-making process and determining next steps. The incumbent must be able to establish priorities in an ever-changing environment, involving various stakeholders, sensitive information and strict timelines.
3	The incumbent must use knowledge, experience and judgment in the review of College policies to ensure that they are compliant with applicable legislation. They must be able to expediently inform relevant stakeholders when a policy is deemed non-compliant and assist with determining next steps for policy amendment.

2. EDUCATION (to be completed by the College)

Education refers to the **minimum level** of formal education and/or the type of training or its equivalent that is required of an incumbent at the **point of hire** for the position. This may or may not match an incumbent's actual education or training.

The College is to identify the minimum level of education and/or type of training or its equivalent that is required for the position based upon the College's recruitment standards.

Non-Post Secondary

Partial Secondary School

Secondary School Completion

Post Secondary

1-Year Certificate

4-Year Degree

2-Year Diploma

Masters Degree

3-Year Diploma/Degree

Post Graduate Degree

Professional Designation

Specify: _____

Other

Specify: _____

Specify and describe any program speciality, certification or professional designation necessary to fulfil the requirements of the position.

Degree in disciplines including: political science; communications; ethics/law; and/or public policy.

Specify and describe any special skills or type of training necessary to fulfil the requirements of the position (e.g., computer software, client service skills, conflict resolution, and operating equipment).

- An engaging speaker and presenter who can initiate, facilitate and promote Information and Protection of Privacy policies and practices within the organization.
- Able to apply logic and attention to detail to decipher circumstances surrounding privacy breaches.
- Familiar with word processing and presentation software. Able to understand basic technical terminologies.
- Strong reading skills, with the ability to decipher complex and/or high volumes of written information and legislation.
- Strong research skills.
- Strong customer service skills with an attention to responsiveness and exceptional service delivery.
- Ability to maintain tact, discretion and confidentiality when dealing with sensitive issues.

- Ability to work independently and collaboratively as part of a team and able to develop and maintain effective working relationships with individuals at all levels of the organization.
- Deep appreciation and commitment to diversity and inclusion.
- Strong business and policy writing skills, with the ability to communicate complex concepts and summarize complicated scenarios using concise and simple language.

3. EXPERIENCE (to be completed by the College)

Experience refers to the amount of **related, progressive** work experience required to obtain the essential techniques, skills and abilities necessary to fulfil the requirements of the job at the **point of hire** into the position. This may or may not match the incumbent=s actual amount of experience.

The College is to identify the minimum amount and type of experience appropriate for the position based upon the College=s recruitment requirements.

Experience required at the point of hire. Up to and including:

- | | |
|--|---|
| <input type="checkbox"/> 0 - no experience | <input type="checkbox"/> 3 years |
| <input type="checkbox"/> 1 month | <input checked="" type="checkbox"/> 5 years |
| <input type="checkbox"/> 3 months | <input type="checkbox"/> 7 years |
| <input type="checkbox"/> 6 months | <input type="checkbox"/> 9 years |
| <input type="checkbox"/> 1 year | <input type="checkbox"/> 12 years |
| <input type="checkbox"/> 18 months | <input type="checkbox"/> 15 years |
| <input type="checkbox"/> 2 years | <input type="checkbox"/> 17 years |

Specify and describe any specialized type of work experience necessary to fulfil the requirements of the position.

- Experience with FIPPA and PHIPA privacy legislation required.
- Experience writing formal correspondences with legal citation.
- Experience working in a complex decision-making environment with formal and informal policies and structures.
- Experience in the development/writing of policies, procedures, agreements, reports, letters.
- Experience in researching best practices and providing recommendations.
- Experience providing exceptional customer service

4. INITIATIVE - INDEPENDENCE OF ACTION

Initiative - Independence of action refers to the **amount of responsibility** inherent in a position and the **degree of freedom** that an incumbent has to **initiate** or **take action** to complete the requirements of the position. An incumbent is required to foresee activities and decisions to be made, then take the appropriate action(s) to ensure successful outcomes. This factor recognizes the established levels of authority which may restrict the incumbent's ability to initiate or take action, e.g., obtaining direction or approval from a supervisor, reliance on established procedures/methods of operation or professional practices/standards, and/or built-in-controls dictated by computer/management systems.

Briefly describe up to three typical job duties/types of decisions that the incumbent is required to perform using their initiative without first having to obtain direction or approval from a supervisor.

1	The Privacy and Policy Officer will advise the Department Head(s) on the course of action to follow pertaining to a privacy breach. The Privacy and Policy Officer will work with Department Head(s) to identify which activities would remediate reported privacy incidents or violations with minimal delay. Department Heads will look to the Policy and Privacy Officer as the expert advisor.
2	The Privacy and Policy Officer will take a lead role in reviewing and identifying privacy risks in existing systems and processes. The Privacy and Policy Officer will then bring forward identified risks, together with recommendations on how to address them, to the respective system and process owners for discussion.
3	The Privacy and Policy Officer will manage all policy review and ensure legislative compliance. They will provide guidance to internal stakeholders on what changes, if required, are needed for internal systems/processes to be in compliance with applicable legislation(s).

Briefly describe up to three typical job duties/types of decisions that the incumbent is required to perform which required the direction or approval from a supervisor.

1	Final approval of contentious or complex Freedom of Information decision letters is with the Manager and/or Department Head
2	Issues management pertaining to department specific incidents concerns should be in consultation with the Manager and/or Department head
3	Final approval of all Privacy related and Office of the President policies, processes, procedures, training and resources is with the Manager and /or Department Head

Give specific examples of guidelines, procedures, manuals (formal or informal), computer systems/programs that are used in performing job duties and in making decisions, e.g., Government regulations, professional or trade standards, College policies or procedures, department or program procedures, computerized/manual programs/systems and any other defined methods or procedures.

- All relevant Fleming College policies, procedures and practices.
- Freedom of Information and Protection of Privacy Act
- Personal Health Information Protection Act
- Personal Information Protection and Electronics Document Act (PIPEDA);
- General Data Protection Regulation

5. POTENTIAL IMPACT OF DECISIONS

Potential Impact of Decisions recognizes the **potential consequences** that **errors in judgement** made by an incumbent, despite due care, could have on the College. Usually, the higher the level of accountability inherent in a position, the greater the potential consequences there are on the College from errors in judgement.

Give up to three examples of the typical types of errors in judgement that an incumbent could make in performing the requirements of the position. Do not describe errors which could occur as a result of poor performance, or ones that are rare or extreme. Indicate the probable effects of those errors on the College, e.g., loss of reputation of program/College, waste of resources, financial losses, injury, property damage, affects on staff, students, clients or public.

- a. Poor judgement in the release of records under FOI requests may result in sensitive information ending up in the wrong hands and subsequently being used to the detriment of Fleming College or Fleming College's strategic partners, resulting in financial or reputational harm.
- b. If Fleming College's obligations to steward stakeholders' private information are not kept, there is legal liability that may result
- c. If best practices in protecting personal information are not communicated to the Fleming College community, the likelihood of privacy breaches will increase, resulting in financial or reputational harm.

6. CONTACTS AND WORKING RELATIONSHIPS

Contacts and Working Relationships refers to the **types, importance** and **intended outcomes** of the contacts and working relationships required by an incumbent to perform the responsibilities of a position. It also measures the skill level required to be effective in dealing with contacts and being involved in working relationships. This factor does **not** focus on the level of the contact, but on the **nature** of the contact.

Indicate by job title, with whom an incumbent is required to interact to perform the duties and responsibilities of the positions. Describe the nature, purpose and frequency of the interaction, e.g., exchanging information, teaching, conflict resolution, team consultation, counselling.

Contacts	Contacts by JOB TITLE	NATURE and PURPOSE of Contact	Frequency of Contact	
			Occasional	Frequent
Internal to the College, e.g., students, staff, management, colleagues.	Manger of Operations – President's Office	Reporting, updating, receiving direction, seeking advice, establishing work priorities		X
	IT Administration and Staff	Provide privacy consultation as required. Collaborate to respond to privacy breaches and FOI requests. Seek consultation on information technology related privacy matters. Develop resources and online tools for information dissemination and training. Collaborate to ensure existing policies are current and compliant with overarching policies and relative legislation. Assist in identifying existing policies which are redundant and recommend new policies for development.		X
	College Administration	Provide training, interpret and explain policies, procedures and legal obligations; make recommendations; receive, investigate and resolve privacy complaints; clarify privacy terms. Support policy development and policy review. Collaborate to respond to privacy breaches and FOI requests.		X
	Students	Receive, investigate and resolve complaints; answer queries related to privacy and policies in the College; privacy awareness	X	
	College Faculty and	Provide training, interpret and		X

	Support Staff	<p>explain policies, procedures and legal obligations; make recommendations; receive privacy complaints and refer to Department Heads; clarify privacy terms and requirements.</p> <p>Support with policy research and development (as requested by their respective Department Head).</p> <p>Seek information on privacy investigations, when required.</p>		
External to the College, e.g., business and industry representatives, suppliers, advisory committee members, staff at other colleges, government officials, and general public	Contacts by JOB TITLE	NATURE and PURPOSE of Contact	Frequency of Contact	
			Occasional	Frequent
	Information and Privacy Commissioner of Ontario (IPC)	Seek advice and counsel. Cooperate in breach investigations. Provide data/witness statements for potential arbitration cases	X	
	Legal Counsel; Consultants	Request clarification on legislation/direction; best practices; and acquire advice on FOI response that might be contentious, information gathering	X	
	Third parties (usually business partners with Fleming College)	Notification to third parties if a FOI request involves them. Provide clarification on FOI process and answer queries related to third parties and College's role in the FOI process Advise on applicable policy and/or procedure and refer to Department Head	X	
	Anyone who submits a FOI request	Process request, seek clarification if needed, respond to requestor on College's decision	X	
	Colleagues at other Colleges/post-secondary institutions	Sharing of policy and privacy best practices and information, collaborating on policy and privacy related projects.	X	
Occasional (O)	Contacts are made once in a while over a period of time.			
Frequent (F)	Contacts are made repeatedly and often over a period of time.			

7. a) CHARACTER OF SUPERVISION/FUNCTIONAL GUIDANCE

Character of Supervision identifies the **degree and type** of supervisory responsibility in a position or the nature of functional/program supervision, technical direction or advice involved in staff relationships.

Required to coordinate, control and provide general supervision for the entire division including the

quality and quantity of work, and overall achievements. Responsible for hiring, motivating, promoting, appraisal, discipline and terminating staff.

(/) Check the applicable box(es) to describe the type of supervisory responsibility required by an incumbent in the position:

- Not responsible for supervising or providing guidance to anyone.
- Provides technical and/or functional guidance to staff and/or students.
- Instructs students and supervises various learning environments.
- Assigns and checks work of others doing similar work.
- Supervises a work group. Assigns work to be done, methods to be used, and is responsible for the work performed by the group.
- Manages the staff and operations of a program area/department.*
- Manages the staff and operations of a division/major department.*
- Manages the staff and operations of several divisions/major departments.*
- Acts as a consultant to College management.
- Other e.g., counselling, coaching. Please specify:

any Fleming College representative involved in a privacy breach or FOI request; external stakeholders affected by same.

* Includes management responsibilities for hiring, assignment of duties and work to be performed, performance management, and recommending the termination of staff.

Specify staff (by title) or groups who are supervised/given functional guidance by an incumbent.

Direct Reports:

Indirect Reports:

7. b) SPAN OF CONTROL

Span of Control is complementary to **Character of Supervision/Functional Guidance**. Span of Control refers to the **total number of staff** for which the position has supervisory responsibility, (i.e., subordinates, plus all staff reporting to these subordinates).

Enter the total number of full time and full time equivalent staff reporting through to the position. Also identify the number of staff for whom the position has indirect responsibility (contract for service), if applicable.

Type of Staff	Number of Staff
Full-Time Staff	0
Non Full Time Staff (FTE) *	0
Contract for Service **	0
Total:	0

*** Full Time Equivalency (FTE) conversions for non-full time staff are as follows:**

Academic Staff

Identify the total average annual teaching hours taught by all non-full time teachers (part-time, partial load and sessional) for which the position is accountable and divide by 648 hours for post-secondary teachers and 760 hours for non-post-secondary teachers.

Support Staff

Identify the total average annual hours worked by part-time support staff for which the position is accountable and divide by 1820 hours.

Administrative Staff

Identify the total average annual hours worked by non-full time administrative staff for which the position is accountable and divide by 1820 hours.

**** Contract for Services**

When considering Acontracts for services,@ review the nature of the contractual arrangements to determine the degree of Asupervisory@ responsibility the position has for contract employees. This could range from Ano credit for supervising staff@ when the contracting company takes full responsibility for all staffing issues to Aprorated credit for supervising staff@ when the position is required to handle the initial step(s) when contract staffing issues arise.

8. PHYSICAL AND SENSORY DEMANDS

Physical/Sensory Demands considers the **degree** and **severity** of exertion associated with the position. The factor considers the intensity and severity of the physical effort rather than the strength or energy needed to perform the task. It also considers the sensory attention required by the job as well as the frequency of that effort and the length of time spent on tasks that cause sensory fatigue.

Identify the types of physical and/or sensory demands that are required by an incumbent. Indicate the frequency of the physical demands as well as the frequency and duration of the sensory demands. Use the frequency and duration definitions following the tables to assist with the descriptions.

PHYSICAL DEMANDS

Describe the types of activities and provide examples that demonstrate the physical effort that is required in the position on a regular basis, i.e., sitting, standing, walking, climbing, lifting and/or carrying light, medium or heavy objects, pushing, pulling, working in an awkward position or maintaining one position for a long period of time.

Types of Activities that Demonstrate <u>Physical</u> Effort Required	Frequency (note definitions below)				
	Occasional	Moderate	Considerable	Extended	Continuous
Lifting/moving/carrying notebook computers and related equipment	X				
Sitting while investigating privacy threats/breaches			X		
Typing on keyboard					X

SENSORY DEMANDS

Describe the types of activities and provide examples that demonstrate the sensory effort that is required in the position on a concentrated basis, i.e., reading information/data without interruption, inputting data, report writing, operating a computer or calculator, fine electrical or mechanical work, taking minutes of meetings, counselling, tasting, smelling etc.

Types of Activities that Demonstrate <u>Sensory</u> Effort Required	Frequency (note definitions below)					Duration
	Occasional	Moderate	Considerable	Extended	Continuous	Short Intermediate or Long
Reading/analyzing privacy legislation, IPC arbitration rulings, IPC published best practices, privacy provisions in contracts, RFPs, etc.				X		I
Operating a computer					X	L
Active listening and note taking when conducting investigations, and providing consultation services			X			I

Types of Activities that Demonstrate <u>Sensory Effort</u> Required	Frequency (note definitions below)					Duration
	Occasional	Moderate	Considerable	Extended	Continuous	Short Intermediate or Long
Writing reports, briefing notes, and policies			X			I
Delivering workshops/training sessions/presentations		X				I

FREQUENCY:

Occasional:	Occurs once in a while, sporadically.
Moderate:	Occurs on a regular, ongoing basis for up to a quarter of the work period.
Considerable:	Occurs on a regular, ongoing basis for up to a half of the work period.
Extended:	Occurs on a regular, ongoing basis for up to three-quarters of the work period.
Continuous:	Occurs on a regular, ongoing basis throughout the entire work period except for regulated breaks.

DURATION:

Short:	Up to one hour at a time without the opportunity to change to another task or take a break.
Intermediate:	More than one hour and up to two hours at a time without the opportunity to change to another task or take a break.
Long:	More than two hours at a time without the opportunity to change to another task or take a break.

9. WORKING CONDITIONS

Working Conditions considers the frequency and type of exposure to undesirable, disagreeable environmental conditions or hazards, under which the work is performed.

Describe any unpleasant environmental conditions and work hazards that the incumbent is exposed to during the performance of the job.

Environment

Describe the types of activities and provide examples that demonstrate exposure to unpleasant environmental conditions in the day-to-day activities that are required in the job on a regular basis, e.g., exposure to dirt, chemical substances, grease, extreme temperatures, odours, noise, travel, verbal abuse, body fluid, etc. Indicate the activity as well as the frequency of exposure to undesirable working conditions.

Types of Activities That Involve Job Related Unpleasant Environmental Conditions	Frequency (note definitions below)		
	Occasional	Frequent	Continuous
Travel to multiple campuses, vendor sites, conferences and off-campus meeting locations	x		
On-call work	x		

Hazards

Describe the types of activities and provide examples that demonstrate the hazards in the day-to-day activities that are required in the job on a regular basis, e.g. chemical substance, electrical shocks, acids, noise, exposure to infectious disease, violence, body fluids, etc. Indicate the activity as well as the frequency of exposure to hazards.

Types of Activities That Involve Job Related Hazards	Frequency (note definitions below)		
	Occasional	Frequent	Continuous
Investigative work may expose incumbent to potential verbal abuse	x		

Frequency:

Occasional	Occurs once in a while, sporadically.
Frequent	Occurs regularly throughout the work period.
Continuous	Occurs regularly, on an ongoing basis, throughout most of the work period.

Additional Notes Pertaining to this Position:

The incumbent will deal with information of a highly sensitive and confidential nature on an ongoing basis, particularly when investigating privacy incidents and breaches.