



# 10 Steps to a Privacy and Civil Liberties Policy

Global Justice  
Information  
Sharing  
Initiative

United States  
Department of Justice

- 1. Identify necessary resources to develop and implement a privacy and civil liberties policy**
  - Designate the project champion to lead development, allocate resources, and oversee the program.
  - Designate the privacy and civil liberties officer to support development, implementation, and ongoing operations.
  - Perform the resource justification to estimate resource needs.
  - Designate the project team leader for day-to-day project management.
  - Identify project team members—experts in areas of privacy and civil liberties law, public affairs or public relations, technology, and operations.
- 2. Identify stakeholders**

In addition to agencies sharing information, stakeholders may include nongovernmental organizations, other clients/consumers, advocates, the media, and others who are essential to the development and implementation of the privacy policy.
- 3. Develop guidance statements**

These include the vision, mission, and values statements and goals and objectives for the creation of the privacy policy.
- 4. Develop a project charter**

The project charter will include an introduction, background, membership, and the previously drafted guidance statements.
- 5. Perform necessary analyses**
  - Information flow analysis to determine what personally identifiable information the agency collects, uses, maintains, and disseminates
  - Legal analysis to analyze applicable laws, regulations, and policies
  - Gap analysis to identify legal and technological gaps and conflicts in laws and practices that require reconciliation
- 6. Determine applicability and draft the policy**

Use the above analyses to determine the scope and content of the policy. Draft an outline and develop policy language using the guidance statements, project charter, and results of the analyses identified above as a guide.
- 7. Vet the policy during development**

Solicit commentary and buy-in from stakeholders and agency constituents prior to finalizing the policy.
- 8. Obtain formal adoption of the policy**

Obtain formal adoption of the policy by the project team, privacy and civil liberties officer, project champion, any governing body and, if applicable, any legislative body.
- 9. Roll out necessary outreach and training**

Make the policy readily available to justice partners, stakeholders, and the general public, and ensure appropriate training for ongoing operations.
- 10. Ensure accountability**

Identify methods for auditing and monitoring the implementation of and subsequent compliance with the policy. Incorporate revisions and updates identified through the monitoring process.



*10 Steps to a Privacy and Civil Liberties Policy* was developed by the U.S. Department of Justice's Global Justice Information Sharing Initiative (Global) as an executive overview for high-level, managerial, and administrative functions within an agency. Based on Global's hallmark privacy resource – *Privacy and Civil Liberties Policy Development Guide and Implementation Templates* – 10 Steps demonstrates the ten core steps an agency can follow to develop a privacy and civil liberties policy.

## For More Information

[www.it.ojp.gov/global](http://www.it.ojp.gov/global)

or contact DOJ's Global at: (850) 385-0600

## About Global

The U.S. Department of Justice's Global Justice Information Sharing Initiative (Global) serves as a Federal Advisory Committee to the U.S. Attorney General on critical justice information sharing initiatives. Global promotes standards-based electronic information exchange to provide justice and public safety communities with timely, accurate, complete, and accessible information in a secure and trusted environment. Global is administered by the U.S. Department of Justice, Office of Justice Programs, Bureau of Justice Assistance.

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