Accountability
Conceptual Framework

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Motivations for an accountability-based approach
- Drivers for such an approach in cloud ecosystems
- Emerging issues in cloud ecosystems

What is accountability?
- Accountability definitions
- Accountability attributes, practices, mechanisms and tools
- Accountability model

Accountability approach
- Accountability framework
- Interdisciplinary approach
- Objectives
Drivers for Accountability

Globalisation and new technologies

• Cloud computing is the most significant shift in IT deployment

Uncertainty and trust (for consumers, clients and regulators)

• Privacy and trust comes from sound stewardship of information by service providers for which we need to hold them accountable

Regulatory complexity in global business environments, especially for cloud

• Accountability addresses global interoperability
• Clear and consistent framework of data protection rules
• Allows avoidance of complex matrix of national laws and reduces unnecessary layers of complexity for cloud providers
• New technologies like cloud are straining traditional privacy frameworks
Evolution of regulatory frameworks

**ASIA**
- APEC Cross Border Privacy Rules
- New country laws

**EUROPE**
- Binding Corporate Rules
- Revision of EU Privacy Directive

**NORTH AMERICA**
- Enforcement powers in Canada
- Proposed Consumer Privacy Bill in USA

**LATIN AMERICA**
- New laws in Mexico, Colombia
- Proposed laws in Peru, Costa Rica, Chile ...

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What is Accountability?
Defining Accountability

Conceptual Definition of Accountability

- Accountability consists of defining governance to comply in a responsible manner with internal and external criteria, ensuring implementation of appropriate actions, explaining and justifying those actions and remedying any failure to act properly.

  - Applicable across different domains and capturing a shared multidisciplinary understanding within the project
  - Concerned about governance

  - Responsibly and proactively (explaining, justifying, remedying) delivery of actions
  - Compliance with respect to internal and external criteria defined by stakeholders

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Accountability for Data in the Cloud

Definition of Accountability

- Accountability for an organisation consists of accepting responsibility for the stewardship of personal and confidential data with which it is entrusted in a cloud environment, for processing, sharing, storing and otherwise using the data according to contractual and legal requirements from the time it is collected until when the data is destroyed (including onward transfer to and from third parties).

- It involves committing to legal, ethical and moral obligations, policies, procedures and mechanisms, explaining and demonstrating ethical implementation to internal and external stakeholders and remedying any failure to act properly.

Ethical aspects of accountability

Deploying mechanisms and tools

Contextualising accountability for data governance in cloud ecosystems

personal and confidential data
Accountability Model

From accountability to being accountable

• Operationalise the accountability definitions
• Capture different abstraction levels of accountability
• Identify attributes contributing towards accountability
• Characterize accountable organisations
• Identify elements of accountability practices
• Enable accountability practices
**Responsibility:** Responsibility may be defined as the state of being assigned to take action to ensure conformity to a particular set of policies or rules.

**Transparency:** Transparency involves operating in such a way as to maximise the amount of and ease-of-access to information which may be obtained about the structure and behaviour of a system or process.

**Assurance:** Assurance is the provision of evidence. An accountability system can produce evidence that can be used to convince a third party that a fault has or has not occurred.

**Remediation:** Remediation is the act or process of correcting a fault or deficiency.

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**Accountability Attributes**

Conceptual attributes of accountability as used across different multidisciplinary domains

**A4Cloud Glossary**

Defined in the project glossary
Organisational accountability

Accountability practices – What organisations must do to be accountable

- Identify Risks and Opportunities
- Integrated Governance

Commitment
- Solid policies aligned to external criteria
- Management commitment
- Full transparency

Implementation
- Mechanisms to ensure policies and commitments are put into effect with employees

Validation
- Monitoring and assurance programs that validate both coverage and effectiveness of implementation

Demonstration
- DEMONSTRATE capacity to internal stakeholders
- DEMONSTRATE capacity to external stakeholders
- DEMONSTRATE capacity to individual data subjects

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Diverse accountability mechanisms and tools that support accountability practices, that is, accountability practices use them.
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Accountability Approach

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Rationale for an accountability-based approach

- Highlighted its relevance for global business & cloud computing

Defined accountability

- Clarified focus and scope
- Introduced accountability model

Introduced accountability framework

- Overall approach
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Thank You.

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