Is There a Global Approach to Workplace Privacy?

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Two Competing Approaches

- Property-Approach:
  - Employer owns resources
  - Controls expectations of privacy.

- Rights-Approach:
  - Employee human right
  - Dignity and a private life
The Questions: Question 21

Should employers be allowed to:

- a) Use CCTV?
- b) Read E-mails?
The Questions: Question 22

Should employers be allowed to share employee information with the:

• a) government?

• b) private sector?
The Property Answers

1. Yes, in any circumstance.

2. Yes, in order to evaluate the employee.
The Rights Answers

3. No, unless employee agrees.

4. No, in any circumstance.
Should employers be allowed to use CCTV?

- Yes
- Yes, in order to evaluate employee
- No, unless employee agrees
- No

Legend:
- France
- Spain
- Hungary
- Brazil
- Mexico
- Canada
- USA
Should employers be allowed to read E-mail?

- Yes
- Yes, in order to evaluate employee
- No, unless employee agrees
- No

Legend:
- France
- Spain
- Hungary
- Brazil
- Mexico
- Canada
- USA
Should employers be allowed to share employee information with the government?

- Yes
- Yes, in order to evaluate employee
- No, unless employee agrees
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Legend:
- France
- Spain
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Should employers be allowed to share employee information with the private sector?

- Yes
- Yes, in order to evaluate employee
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Analysis

- EU rights-approach stronghold

- US not isolated

- Email/CCTV distinction:
  - Privacy/security trade-off
  - Dignity cultural-dependent