

The ICO contacts and advises the sanctioned party of the general requirements and procedures for meeting the conditions. This is followed by a baseline evaluation of whatever program the party presently may have (or put in place at the time) with suggestions for improvements where appropriate.

The ICO monitors the implementation of the program, including reviewing periodic reports, changes in the program, remedial actions taken in response to the sanctioned misconduct as well as other misconduct subsequently detected, and the like.

After the program has been operational, normally for a period of at least one year, the party would be entitled to submit an Application setting forth arguments for and evidence of its compliance.

## The Conditional Release Process

