Canadian Institute for Health Information

Policy on Privacy and Security Risk Management

Purpose

This Privacy and Security Risk Management Policy sets out the requirements for CIHI to identify, assess, treat and monitor privacy and security risks, as well as associated roles and responsibilities.

Scope

All staff at CIHI play a role in identifying and managing privacy and security risks.

Definitions

Impact: A measurement of the severity of a risk.

Likelihood: A measurement of the chance that a risk might occur.

Mitigating action: The action to be taken to reduce the likelihood and/or impact of a risk.

Privacy and security risk: The possibility that an event may occur that

- Results in non-compliance with privacy laws and regulations or CIHI’s privacy and information security policies or procedures;
- Results in a failure to safeguard or prevent unauthorized collection, use or disclosure of personal information, or more generally the confidentiality, integrity and availability of CIHI’s data holdings; or
- Otherwise jeopardizes CIHI’s status under the Personal Health Information Protection Act, 2004 (PHIPA).

All of these would adversely affect the achievement of CIHI’s strategic goals.
**Privacy and security risk management (PSRM):** A formal, repeatable process for identifying, assessing, treating and monitoring risks in order to minimize the probability of such risks materializing and/or their impact should they occur.

**Privacy and Security Risk Register:** A consolidated list of CIHI’s current identified privacy and security risks.

**Risk treatment:** The modification of risk by mitigation, transfer, avoidance or acceptance of the risk.

**Risk treatment plan:** The identified process and implementation of options to mitigate, transfer, avoid or accept a risk.

**Policy**

CIHI shall establish a Privacy and Security Risk Management (PSRM) Program and associated processes that

- Ensure privacy and information security risks are properly identified, assessed, treated and monitored;
- Integrate with CIHI’s Corporate Risk Management Program;
- Ensure CIHI meets its legal obligations and regulatory expectations with respect to privacy and information security; and
- Contribute to CIHI’s culture of privacy and security risk awareness.

**Roles and responsibilities**

1. **CIHI’s Senior Management Committee** is responsible for PSRM across CIHI and for

   - Monitoring and reviewing quarterly risk mitigation status reports;
   - Recommending for possible inclusion in CIHI’s Corporate Risk Register any privacy and security risks that may meet the definition of a corporate risk, as set out in the Corporate Risk Management Program;
   - Accepting untreated or residual risk on behalf of the corporation; and
   - Reviewing and resolving any escalations from the chief privacy officer (CPO) and/or chief information security officer (CISO) with respect to privacy and security risk treatment.

2. The **Privacy, Confidentiality and Security Committee** is responsible for

   - Reviewing and approving CIHI’s Privacy and Security Risk Register on a regular basis as submitted by the CPO and the CISO.
3. **Senior managers or other identified owners** are responsible for PSRM within their area and for:
   - Collaborating with the CPO and CISO to identify possible privacy and security risks that exist or may arise in their area;
   - Assisting the CPO and CISO in developing a plan to treat privacy and security risks;
   - Monitoring all privacy and security risks applicable to their area; and
   - Reporting quarterly to the CPO and CISO on the status of all risk treatment plans within their area.

4. The **CPO and CISO** are responsible for CIHI’s PSRM processes and for:
   - Developing and implementing a PSRM strategy, including but not limited to this policy and a PSRM Framework that aligns with CIHI’s Corporate Risk Management Program and supports the Information Security Management System (ISMS) Risk Management Program;
   - Collaborating with CIHI’s senior managers to identify privacy and security risks throughout CIHI and recommending risk treatment in accordance with the PSRM Program;
   - Assessing privacy and security risks, in accordance with the PSRM methodology;
   - Maintaining the Privacy and Security Risk Register, in accordance with the PSRM Framework;
   - Reporting to senior managers or other identified owners any privacy and security risks that are applicable to their area;
   - Assisting senior managers or other identified owners with developing a risk treatment plan for their risks;
   - Monitoring all privacy and security risks in the Privacy and Security Risk Register, including an annual review of the assessments and risk treatment plans;
   - Recommending for possible inclusion in CIHI’s Corporate Risk Register any privacy and security risks that may meet the definition of a corporate risk, as set out in the Corporate Risk Management Program;
   - Providing quarterly risk mitigation progress reports to the Senior Management Committee; and
   - Reviewing this policy and the PSRM Framework on an annual basis.
Related policies and procedures/supporting documents

Privacy and Security Risk Management Framework

For more information, please contact

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Revision history:

<table>
<thead>
<tr>
<th>Date Y/M/D</th>
<th>Version</th>
<th>Description of revisions</th>
<th>Approval authority</th>
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<tr>
<td>2015-07-16</td>
<td>1.0</td>
<td>Original document</td>
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n/a: Not applicable.