**GPA Global Privacy and Data Protection Awards 2022**

**Entry Form**

To submit an entry to the GPA Global Privacy and Data Protection Awards please complete and email this form to [secretariat@globalprivacyassembly.org](mailto:secretariat@globalprivacyassembly.org) **no later** **than 17 June 2022.**

Note: GPA member authorities can submit as many entries as they wish, but a separate form should be used for each different entry, submitted by the deadline above.

Languages: The GPA documentation Rule 6.2[[1]](#footnote-2) applies.

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| 1. **CONTACT DETAILS FOR THIS ENTRY** | | |
| Privacy/Data Protection Authority: | Office of the Privacy Commissioner of Canada | |
| Person completing this form: | Sue Lajoie |  |
|  | *First name* | *Last name* |
| Job title: | Executive Director,  Compliance, Intake, and Resolution Directorate | |
| Email address: | Sue.lajoie@priv.gc.ca | |

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| 1. **ELIGIBILITY** | |
| By submitting this entry, I confirm that (*please tick all boxes to confirm)*: | |
|  | The Authority is a member of the Global Privacy Assembly |
|  | The initiative described in this entry was undertaken since January 2020. |
|  | I am aware that the information in the entry (other than the contact details in 1(a) above) will be publicised by the GPA Secretariat. |

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| 1. **CATEGORIES** | |
| Please indicate which category you wish to enter.  *Please tick* ***one;*** *please use a separate form for each category you wish to enter:* | |
|  | Education and Public Awareness |
|  | Accountability |
|  | Dispute Resolution and Enforcement |
|  | Innovation |
|  | People’s Choice |
| 1. **DESCRIPTION OF THE INITIATIVE** | |

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| 1. **Please provide a brief summary of the initiative** *(no more than 75 words)* |
| The **RROSH Assessment Tool** is an innovative automated solution to assess whether a privacy breach presents a real risk of significant harm (RROSH) to affected individuals. The Tool was developed recognizing that privacy breaches were increasing in volume and complexity, and that stakeholders were expressing challenges associated with identifying and assessing risks and harms to data subjects. The Tool is rooted in risk science principles to withstand analytical scrutiny and potential challenges. |

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| 1. **Please provide a full description of the initiative** *(no more than 350 words)* |
| The *Personal Information Protection and Electronic Documents Act* (“PIPEDA”) outlines actions that organizations must take following a breach of security safeguards involving personal information. Organizations subject to PIPEDA must, since November 2018, report privacy breaches to the Office of the Privacy Commissioner of Canada (the “OPC”) and notify affected data subjects *if* it is reasonable to believe that the breach creates a real risk of significant harm to an individual. Factors to consider, based on the legislation, are the sensitivity of the personal information involved, and the probability the information has been, is being or, will be misused. While harm is defined in PIPEDA to include, humiliation, damage to reputation or relationships, financial loss, identity theft and more; harm assessment has a subjective element, and consequently, is vulnerable to inconsistent results.  Tested and in use by OPC investigators since January, the Tool was presented at the International Association of Privacy Professionals’ (IAPP) Toronto Canada Conference in May 2022. The RROSH Assessment Tool generated high interest and garnered acclaim with organizations expressing a keen interest to use the Tool as soon as it is available. The OPC will have the public-facing version of the Tool by the end of the year.  The RROSH Assessment Tool is comprised of two parts: a logic and a question wizard.  The logic contains the risk science and delineates how to think through the complex risk assessment process. It includes multiple variables that take into account for instance, the sensitivity of the compromised personal information, the vulnerability of the data subjects, the types of attack, and probability of misuses. These variables feed into the calculation of risk scores, at an individual level and for the broader population affected by the breach. Each risk score is compared to a threshold in the logic to determine if the breach does or does not present RROSH.  The question wizard automates and guides the complex process by posing a series of questions to users, who then input data sourced from the relevant breach report. Since RROSH Tool assessments are based on risk science principles and identify the means and probability of harm enabled by a breach, they are methodologically defensible if challenged. |

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| 1. **Please explain why you think the initiative deserves to be recognised by an award***(no more than 200 words)* |
| While other privacy breach reporting tools exist, the RROSH Assessment Tool takes the assessment of complex concepts to the next level. The Tool’s automation also creates efficiencies allowing for a fast and consistent determination of RROSH. Similarly, the Tool allows for the processing of a greater number of breach reports using fewer OPC investigative resources. Since mandatory breach reporting under PIPEDA came into effect in 2018, the OPC saw at one point a 700% increase in volume of breaches reported to the Office without a corresponding increase in resources. The Tool is proving effective in avoiding a backlog of unassessed breach report.  The Tool is also providing a rich source of business intelligence, identifying trends and/or populations at greater risks. This data will also help identify industry sectors in need of targeted outreach, or topics for guidance and education.  Finally, the Tool is adaptable, and was created knowing that legislative requirements and definitions will change following law reform. As such, the Tool can be easily modified to meet the Office’s future needs, as well as those of Data Protection Authorities in other jurisdictions.  In summary, the Tool is effective, automates complex processes, creates efficiencies, standardizes assessments, is adaptable, and of critical importance to stakeholders, provides a greater level of predictability and consistency. At its core, the Tool was designed to allow for timely management of privacy breaches, thereby reducing risks and harms to affected individuals. |

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| 1. **Please include a photograph or image, if you wish***(This will be published with your entry on the GPA website. The image can be pasted into the box below, be sent as an attachment or a link may be provided)* |
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| 1. **Please provide the most relevant link on the authority’s website to the initiative*,* if applicable** *(The website content does not need to be in English)* |
| N/A at this time. The RROSH Assessment Tool will have its public interface by the end of the year. |

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| 1. **Please provide any other relevant links that help explain the initiative or its impact or success***(e.g. links to news reports or articles):* |
| cid:image001.png@01D87FF2.99504F20  OPC Staff Presenting RROSH Assessment Tool at International Association of Privacy Professionals – Toronto, Canada, May 2022 Conference.  C:\Users\slajoie\AppData\Local\Microsoft\Windows\INetCache\Content.Word\IAPP_T.O._2022 145.jpg  (*photo courtesy of the IAPP Canada Privacy Symposium 2022*)  Session participants comments:  “My favorite session so far”  “Very well presented I appreciated the RROSH assessment and demonstration” |

1. [GPA Rules and Procedures](https://globalprivacyassembly.org/wp-content/uploads/2020/10/GPA-Rules-and-Procedures-October-2020.pdf), Rule 6.2 ‘Assembly documents’:

   Without prejudice to section 4.2, Assembly documents, including accreditation and observer applications may be submitted in English or in another language. In the latter case, the documents shall be accompanied by an English version. Members with the ability and the resources to do so are encouraged to translate proposed resolutions and other Assembly documents such as the Assembly Rules and Procedures. [↑](#footnote-ref-2)