

Unit 4 Seminar Activity 1: Review of NIST Privacy Tools and Alignment with Unit 3 Risk Assessment Methods

The National Institute of Standards and Technology (NIST) provides a suite of privacy engineering tools that support structured identification, analysis, and mitigation of privacy risks across the system lifecycle. Two core instruments underpin this approach:

1. NIST Privacy Framework (PF) v1.0 (2020)

A voluntary, enterprise risk-based structure composed of five functions—**Identify, Govern, Control, Communicate and Protect**—used to operationalise privacy risk management across organisational and technical processes. It is intentionally modelled on the NIST Cybersecurity Framework, enabling integrated adoption within existing SDLC governance structures.

2. NISTIR 8062: Privacy Engineering and Risk Management (2017)

This foundational publication introduces the **Privacy Risk Model**, which defines privacy risk as a function of:

- **Problematic Data Actions** (e.g., over-collection, inappropriate use),
- **Likelihood**, and
- **Impact** on individuals' rights and freedoms.

It also presents engineer-oriented methods, such as data action mapping, risk analysis tables and control alignment, forming the methodological basis for PRAM (the NIST Privacy Risk Assessment Methodology).

Alignment with Unit 3 Risk Methods and the SDLC

Structured Risk Identification (ISO 31000 alignment).

The PF's *Identify* function mirrors ISO 31000's focus on contextualisation of risk

sources. Within the SDLC, this supports **Requirements Engineering**, where data flows, actors, and processing purposes are defined to avoid privacy hazards early.

Categorisation and Control Mapping (NIST RMF alignment).

NISTIR 8062's data-action and control catalogues parallel the NIST RMF's control families (e.g., Access Control, Audit and Accountability). This supports the **Design** phase by embedding privacy-by-design controls such as data minimisation, purpose limitation and de-identification.

Semi-quantitative Scoring (Risk Matrices from the Lecturecast).

The Privacy Risk Model's likelihood–impact scoring aligns with classic SDLC risk matrices. During **Testing**, high-severity data flows (e.g., sensitive categories) trigger re-evaluation similar to OCTAVE or RMF continuous monitoring.

Lifecycle-based Monitoring (Iterative SDLC).

Both PF and NISTIR 8062 emphasise ongoing risk review—aligning with **Maintenance** phases in agile SDLCs, where evolving system behaviour requires repeated privacy audits in line with accountability obligations under GDPR-like regulations.

Conclusion

NIST's privacy tools strengthen the risk assessment approaches from Unit 3 by adding formalised, engineering-oriented methods for evaluating privacy-specific risks. They support SDLC decision-making through structured identification, quantitative scoring and lifecycle-based monitoring. In a user-facing system, NISTIR 8062 can map problematic data actions to SDLC phase gates, ensuring that privacy risks are mitigated as systems evolve.

References

NIST (2020) *NIST Privacy Framework: A Tool for Improving Privacy through Enterprise Risk Management Version 1.0*. National Institute of Standards and Technology. Available at: <https://www.nist.gov/privacy-framework>.

NIST (2017) *NISTIR 8062: An Introduction to Privacy Engineering and Risk Management in Federal Systems*. National Institute of Standards and Technology.
Available at: <https://nvlpubs.nist.gov/nistpubs/ir/2017/NIST.IR.8062.pdf>.