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Honourable Margaret Nakashuk L'honorable Margaret Nakashuk Nanngariyauyuq Margaret Nakashuk

Via Email: admin@atipp-nu.ca

Mr. Graham Steele
Office of the Information and Privacy Commissioner
P.O. Box 1000, Station 270
607 Queen Elizabeth II Way
Igaluit, Nunavut, X0A 0H0

DATE: August 3, 2022

Dear Commissioner,

RE: Response to Review Report #22-218-RR and Recommendations for File #22-111- Privacy Breach

Thank you for your letter dated May 26, 2022, and the Review Report and recommendations, dated May 26, 2022, regarding the above-mentioned file.

Please be advised that the Department of Human Resources welcomes the report and accepts the recommendations.

Recommendations #42 and 43:

I have attached a letter from my Deputy Minister, Les Hickey, which outlines all the actions the Department of Human Resources has taken in keeping the four commitments and to ensure the risk of similar incidents in future is mitigated.

Regards,

Hon. Margaret Nakashuk Minister of Human Resources

cc: Les Hickey, Deputy Minister, Human Resources
Applicant
Peterkin Chakonza, Director, Policy, Planning & Communications, Human Resources
Safiatou Traore, ATIPP Coordinator, Human Resources

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Department of Human Resources
Havaktuliqiyikkut
Ministère des Ressources humaines

Via Email: admin@atipp-nu.ca

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P.O. Box 1000, Station 270
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August 02, 2022

Dear Commissioner,

RE: Response to Review Report #22-218-RR and Recommendations for File #22-111-Privacy Breach

In response to your May 26, 2022, letter to the Minister of Human Resources, Hon. Margaret Nakashuk, in which you shared your Review Report #22-218-RR and recommendations, I am providing this reporting letter, as per recommendation #43 of the report.

Below is an update on the four commitments we made in our letter of March 8, 2022, to ensure to mitigate the risk of similar incidents occurring in future.

1. My department will continue to stress to Staffing Consultants and all hiring managers the importance of keeping all our competitions confidential and, when communicating to candidates, to relay the same consistent message to all our candidates individually.

Status:

Staffing Managers and supervisors are having ongoing training and reminders to all new and existing staff in the Staffing divisions on the importance of candidate privacy and confidentiality, particularly on not using the BCC and CC fields when emailing candidates throughout the recruiting and hiring process.

2. My department will review and update the Staffing Manual to include more detailed communication process with candidates and panel members and a detailed process for video screening, interviews, and appeals.



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Status:

This commitment was added in the Department of Human Resources 2022-2026 Business Plan, as a priority and an action item in the 2023-24 fiscal year. Progress on this priority will be reported at the end of that fiscal year.

3. My department will review and update the Human Resources Manual to include the process for communicating with candidates during the hiring process, screening and conducting the interview.

Status:

A review and identification of the Human Resource Manual directives on staffing, which need updating to include provisions which emphasize the privacy and confidentiality communication in the hiring process was completed. This commitment was also added in the Department of Human Resources 2022-2026 Business Plan, as a priority and an action item in the 2024-25 fiscal year. Progress on this priority will be reported at the end of that fiscal year. HRM501: Hiring Process is one of the top directives being revised.

4. My department will develop training to guide departmental staff on candidate information privacy and protection.

Status:

This commitment aims to directly address the privacy concern stemming from email hygiene and the importance of reinforcing good habits around protecting privacy. My department in collaboration with the Territorial ATIPP Manager developed an ATIPP training on privacy protection tailored specifically for our Staffing Division, as well as all other employees in the department. This new ATIPP training provides an overview of *ATIPPA*, its purpose, why privacy matters, what is considered personal information, what a privacy breach is and how to prevent it. The presentation and material also include specific examples about the proper collection, use and disposal of personal information while emphasizing prevention methods, including email hygiene. The first training was delivered to Staffing Division employees on July 14, 2022. After the training the participants were provided with additional information and material related to privacy management and protection. Ongoing training is being scheduled with employees of other divisions in the department.

In addition to our four commitments and specific actions to support the protection of privacy in our department and the whole government, we are updating the Government of Nunavut's Code of Values and Ethics to strengthen and emphasize privacy protection by including the ten internationally recognized principles of privacy protection and also adding a direct reference to the *Access to Information and Protection of Privacy Act* while encouraging employees to familiarize themselves with the rules and responsibilities within.

In closing, once again, I offer a sincere apology to the complainant and assurance that while accidental, I can say that this incident has led to improvements and a greater focus on protecting privacy. I also want to thank you for taking the time to review this matter thoroughly and for acknowledging that mistakes happen while also advocating for pragmatic solutions that reinforce



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the need for my department to continuously work to improve processes and carefully consider the protection of privacy in all our work.

Sincerely,

Les Hickey

Deputy Minister, Human Resources

cc: Hon. Margaret Nakashuk, Minister of Human Resources Applicant Peterkin Chakonza, Director, Policy, Planning & Communications, HR Safiatou Traore, ATIPP Coordinator, HR