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Building Nunavut Together
Nunavut liuqatigiingniq
Bâtir le Nunavut ensemble

Minister of Finance
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Minista Kiinauyaliqiyitkunun
Ministre des Finances

September 1, 2022

Graham Steele
Commissioner
Office of the Information and
Privacy Commissioner
Iqaluit, NU X0A 0H0

Dear Mr. Steele,

Thank you for your letter of June 14, 2022 regarding your Review Report 22-219-RR.

I appreciate your thoughtful analysis on this file. The situation that occurred is not acceptable to us, and we accept the conclusions you have reached.

With respect to your recommendations, I will respond to each individually:

[49] I recommend Finance review its policy and procedures for archiving or deleting personal information in its vendor payment system. For example, if there has been no activity on a vendor file for a reasonable period set by policy, any personal information in the vendor file should be automatically archived or deleted.

As I mentioned in earlier correspondence, it is already Finance's procedure to create a new vendor database every 3-4 years, and to delete the personal information of any vendor whose information was not used in the previous database's life.

As we have seen with this file, the challenge is not with the procedure itself but ensuring the procedure is followed. The GN's financial systems are extremely old and are entirely manual. This means the database creation and vendor file deletion process cannot be automated. It must be performed by hand. Combined with the ongoing staff shortages we face, we sometimes have to prioritize staff time on essential activities for the continuation of business. This means activities that are not immediately essential to ensuring the GN continues operating may be delayed significantly, as we have seen in this case.

This is not an acceptable situation to us. Currently, we are pursuing a new Enterprise Resource Program (ERP) system that will allow us to significantly improve our operations. A modern ERP would allow us to automate activities like the deletion of unused personal information. As we work to implement the new ERP, we will ensure adequate policies and procedures are in place to address your recommendation.

[50] With respect to this Complainant, I recommend that Finance follow through on the deputy minister's letter of May 10, 2022, to ensure that there is no remaining record of the debt on the Complainant's credit file, and I further recommend that Finance write to the Complainant to confirm this step has been taken. (Finance should note that the collection agency is not the same company that maintains consumer credit files, so writing only to the collection agency, as promised in the deputy minister's letter, is insufficient.)

Although the collection agency is not the same as the credit agency, we cannot directly change what appears on a consumer credit file except through the collection agency. As promised, Finance officials did reach out to the collection agency regarding this file. The collection agency has confirmed that there is no longer any record of this issue on the Complainant's credit file that would be visible to banks or businesses.

[51] With respect to this Complainant, I recommend that Finance delete the Complainant's personal information from its vendor payment system, unless there is a specific operational or audit requirement to retain it.

Our current financial software does not have the concept of 'deleting' a vendor or records within an active database. Instead, we have placed the Complainant's vendor file on 'hold' within the current active database. Vendors which are on 'hold' cannot be accessed without manager approval and a request to re-activate the file. This will prevent any use of the Complainant's file. The next database reset is scheduled for fiscal year 2023/24, at which time the Complainant's record will be completely deleted from our system.

[52] With respect to this Complainant, I recommend that Finance review its vendor payment system to ensure there is no remaining trace of the Toronto address given by the Complainant to Finance in 2009.

The vendor file has been modified to 'Do Not Use' in the address line. Even if all the other safeguards in place fail, there is no mailing address listed so no cheques or invoices can be sent to the Complainant.

Thank you again for your review. Please let me know if you have further questions or concerns.

Sincerely,



Honourable Lorne Kusugak
Minister of Finance

cc. Jeff Chown, Deputy Minister, Finance
Robyn Gibbard, Manager, Corporate Policy, Finance