



**Graham Steele**  
Information and Privacy Commissioner of Nunavut  
[admin@atipp-nu.ca](mailto:admin@atipp-nu.ca)

August 31, 2023

**Re: Response to Review Report 23-245 on the Y-Drive**

Dear Commissioner Steele,

We have thoroughly reviewed the special report 23-245 regarding the Y-drive. Since the conclusion of our audits, we have been actively addressing the issues highlighted. This letter serves as a collective response, outlining our progress and charting our next steps.

**1. Decommissioning the Y-drive**

Given the Y-drive's inherent limitations and inability to provide automated functionalities essential for recordkeeping, security, and compliance with the ATIPP Act, we agree with your recommendation for its decommissioning. CGS's IM/IT division is in the advanced stages of considering a cloud-based solution that integrates with our existing Microsoft 365 framework. We will ensure that our next information management system incorporates privacy by design and can adapt to evolving digital landscapes.

**2. Designating a Privacy Protection Position for Y-drive Drive**

While we recognize the importance of interim measures, assigning a specific senior position for Y-drive drive privacy across all public bodies presents challenges. Several public bodies, in collaboration with CGS IM/IT, have identified logistical and technical constraints that cannot be addressed with our existing resources.

We recognize the importance of accountability and commit to ongoing discussions on how each public body can best address this matter. The ATIPP Coordinator Committee will continue to engage with CGS IM/IT to explore realistic alternatives and share best practices that each public body has self-identified.

**3. Audit Follow-ups and Restricting Access to High-Risk Files**

The immediate handling of high-risk files is largely reported to have been completed. However, mitigating the risk of reoccurrence is an active endeavor. The Y-drive's structural limitations make preventive measures a continuous and labour-intensive effort. The ATIPP Coordinator Committee will reconvene on the topic in November 2023 to assess our progress on this front.

#### **4. Documenting Y-drive Drive Management Procedures**

We accept this recommendation wholeheartedly. As part of our digital transformation journey, CGS is collaborating with GN stakeholders to revamp the Records and Information Management framework. This endeavour aims to establish foundational policies from which individual public bodies can draw tailored directives and guidelines.

Details and progression plans on some of this work can be found in the *Government of Nunavut Response to the Report on the Review of the 2020-2021 and 2021-2022 Annual Reports of the Information and Privacy Commissioner of Nunavut*, tabled in May, 2023.

#### **5. Planning for “Reasonable Security Arrangements”**

Our focus is on solutions that synergize with the GN's existing Microsoft 365 ecosystem. These solutions should offer a comprehensive lifecycle management for records, embedding privacy at their core. CGS IM/IT is evaluating its funding needs for this work to ensure resources can be allocated accordingly. Various public bodies are evaluating tailored systems to enhance their record-keeping and privacy protection capabilities, much like the Department of Health's adoption of Meditech.

Your report has been instrumental in highlighting areas needing improvement. We deeply appreciate the comprehensive analysis and recommendations. As we move forward, our commitment remains firm in upholding the highest standards in information management and privacy protection.

We strive to implement your recommendations to their fullest extent, while being cognizant that achieving optimal privacy security is an evolving task. Our ongoing initiatives will guide our future strategies and resource allocation.

We extend our gratitude for your insightful report and commit to maintaining transparent communications throughout our progress.

Sincerely,



Hon. PJ Akeeagok  
Premier of Nunavut  
Minister of Executive and Intergovernmental Affairs

CC: Ministers  
Deputy Heads  
Territorial ATIPP Office