



April 17, 2024

Mr. Graham Steele
Nunavut Information and Privacy Commissioner
admin@atipp-nu.ca

RE: Privacy Review – Mailing Addresses in Iqaluit Special Report 24-258-SR Our file: 23-152

Dear Commissioner Steele,

I acknowledge receipt of your letter dated April 16th, 2024, along with the enclosed Special Report 24-258-SR.

The Department of Family Services recognizes the potential risk associated with the recent mailing address changes in Iqaluit, which could result in the misaddressing of T5007 slips and lead to the breach of privacy-sensitive client information.

After reviewing the recommendations outlined in the report, I am in full agreement with the Commissioner's position.

My department is committed to the following actions:

- Finalizing the database to incorporate a "civic address" data field within the Income Support Delivery System (ISDS) platform.
- Transferring all temporarily recorded address information from case notes to the appropriate "civic address" data fields upon the implementation of these changes.

The Department of Family Services eagerly anticipates collaborating further with your office on the implementation of these recommendations. I also extend my sincere appreciation for your invaluable assistance and guidance in addressing potential privacy risks within our department.

Regards,

Hon. Margaret Nakashuk
Minister of Family Services



June 25, 2024

Mr. Graham Steele
Information and Privacy Commissioner
Office of the Information and Privacy Commissioner of Nunavut
PO Box 1000, Station #270
Iqaluit, Nunavut X0A 0H0
Email: admin@atipp-nu.ca

RE: Privacy Review – Mailing Addresses in Iqaluit
Special Report 24-258-SR
IPC file: 23-152

Dear Commissioner Steele,

Thank you for your letter dated April 16, 2024, regarding Special Report 24-258-SR, which deals with the privacy risk flowing from the city-wide change to mailing addresses in Iqaluit.

Health is implicated in sections 72 to 92, 120 and 124. Stemming from the privacy risk, as per section 124 you recommended that:

Health review and revise its plan for responding to the Addressing Change, with due consideration being given to (a) reaching out to Iqalummiut before the Anniversary Date to obtain their civic address, (b) streamlining the NHIP address-change process, and (c) ensuring the NHIP staff is trained and resourced to process the expected volume of address changes (see paragraphs 89 to 92).

To address part (a) of your recommendation, Health will:

- Publish public service announcements on social media, radio, and the Government of Nunavut (GN) website beginning in June, reminding Iqalummiut to change their address.
- Hire summer students to help Iqalummiut fill out the forms required for the Nunavut Health Insurance Program (NHIP) to update mailing addresses. The students will be stationed at various locations (including Qikiqtani General Hospital (QGH), Public Health, and both post offices). Students will hand out forms and assist individuals fill them out and send them back to the NHIP.

- Have forms and postage-paid envelopes available at the post offices so that Iqalumiut can fill in and submit their own when students are not available.
- Have forms available with a secure drop off at QGH and Public Health so that Iqalumiut can fill in and drop off when students are not available.

Regarding parts (b) and (c) of your recommendation, Health believes that the current NHIP staffing complement is adequate to manage the influx in address change requests. Address changes are minor in nature and take little time to manage. In terms of the change process, Health believes the current process is manageable; the form requires a signature along with the new address. As well, as noted above in response to recommendation (a), Health will hire students to assist Iqalumiut with the address change forms, which mitigates some of the concerns you raised.

Health continues to have discussions with Canada Post to resolve some of the issues you mention, including identifying opportunities to cross-reference information to verify the information provided by Iqalumiut.

I trust that these responses are sufficient. However, if you have any additional questions do not hesitate to reach out.

Matna,



Hon. John Main
Minister of Health

cc: Megan Hunt, Deputy Minister of Health
Susan Anderson, Chief Information Officer
Patrick Lo, Interim Privacy Officer, Health
Greg Babstock, Director Corporate Services
Murugesh Narayanan, ATIPP Coordinator, Health



Mr. Graham Steele, Commissioner
Office of the Information and Privacy Commissioner of Nunavut
Iqaluit, Nunavut, X0A 0H0

AUG 14 2024

Sent via e-mail: admin@atippnu.ca

RE: File 23-152 Privacy risk – Canada Post addressing change in Iqaluit

Dear Commissioner Steele,

In response to your letter dated April 16, 2024, in which you requested a response to the Special Report 24-258-SR regarding the impact of Canada Post's changes to addresses in Iqaluit, please find responses from the Department of Finance below:

[93] to [105] [121] and [125] Finance's approach to updating employee addresses.

Recommend that Finance review and revise its plan for responding to the Addressing Change, with due consideration being given to:

- 1. Reaching out to Iqalummiut employees before the Anniversary Date to obtain their civic address.**
 - a) Finance continues to remind employees and the public to ensure their addresses are up to date in our systems in all Information Bulletins and Public Service announcements issued about our programs and services.
 - b) In December, prior to tax season, Finance will issue another reminder to both current and former employees to contact the department to ensure the department has the correct civic addresses on file.
 - c) Unfortunately, a limitation in ePersonality and FreeBalance is that not all employees or businesses have access to these systems to make changes themselves - this is only available to employees with human resources or financial services roles.



d) This is why the shift to the new Fusion Cloud system will be imperative, as it provides more functionality for users to update their own information.

2. Allowing employees to change their own mailing address when signed into e-Personality's self-service feature.

a) As mentioned in 1(c) above, the current ePersonality system (including Self-serve) does not have the functionality to allow GN employees to change their own information in the system. As the GN moves to a new Fusion Cloud system, all GN employees will be asked and reminded through email notifications, to update their own contact information directly in the system. It is easy to do and includes an opportunity to include multiple contacts as necessary. This employee contact information update feature can be used by all departments - not just Finance and HR. This provides more personal responsibility and individual control over information.

3. Ensuring Pay and Benefits Officers are trained and resourced to process the expected volume of address changes.

a) Pay and Benefits officers are fully trained and understand the increased responsibility in affecting this change for every employee within the GN. It is a large task that has been assigned to the hard-working group since the changes were implemented by Canada Post.

Please feel free to reach out to Ibrahim Suleiman, Assistant Comptroller General, at ISuleiman1@gov.nu.ca to assist with answering any additional questions or concerns.

Sincerely,

Hon. Lorne Kusugak
Minister of Finance

Cc: Ibrahim Suleiman, Assistant Comptroller General
Dan Young, Deputy Minister, Finance