



Graham Steele  
Information and Privacy Commissioner of Nunavut  
Iqaluit, Nunavut

Dear Commissioner Steele,

The Department of Finance has read your analysis and recommendations in Review Report 25-288-RR regarding the use of SIN numbers to administer medical expense reimbursement payments.

Your Review Report makes five recommendations, three of which directly pertain to the Department of Finance:

1. **"I recommend** that Health stop collecting Social Insurance Numbers from claimants for medical-expense reimbursement, and that Finance formally confirm to the Health processing unit in Rankin Inlet that collection of a claimant's SIN is not mandatory."
2. **"I recommend** that Finance review the use of the generic email inbox used by the Accounts Payable unit in Iqaluit to (a) confirm that access is restricted by position to those who need to see it, and (b) delete emails from which the relevant information has been transferred to Oracle Fusion Cloud."
3. **"I recommend** that Finance set a firm date for the decommissioning of the accounts-payable portion of the old ERM system and ensure that personal information contained therein is, on that date, permanently and securely deleted."

**Recommendation 1: Stop collecting SINS and confirm that they are not mandatory**

Vendor accounts, which in our accounting system are used for any individual or company receiving a payment, are created or updated when a payment is required.

The Fusion Cloud accounting system was populated using vendor account information from the GN's former accounting database, Freebalance.

Both systems – Fusion and Freebalance before it – have limited configurations for the types of ID numbers it can collect to create the vendor account. These include: name, address, phone, email, banking information, date of birth, SIN, Business/GST number

and Vendor Code.

These parameters are reflected on the Vendor Update Request (VUR) form provided to the recipient to create or modify their vendor account.

Unfortunately, neither Freebalance or Fusion were configured to accept alternative identification numbers, such as health care cards or other government-issued ID, so this information cannot yet be stored in Fusion (although we someday hope to have this functionality).

When data was being migrated from Freebalance to Fusion in early 2025, we only moved SIN from Freebalance if the vendor account did not have a date-of-birth (DoB). This was done in an attempt to move away from collecting SIN as a unique identification.

As a result, however, our Financial Controls team responsible for administering the payments through our accounting system ran into significant operational issues, especially related to duplicate legacy accounts leftover from Freebalance that carried over into Fusion.

When there is a payment request and VUR submitted, Financial Controls staff check the database in Fusion to make sure that there is not an existing vendor account already in the system.

Frequently, a company name may have been misspelled during data entry, or an individual's address may have changed since their last payment. This results in duplicate vendor accounts, which clutter the system and can result in erroneous or delayed payment.

It is common to require two forms of identification for verification of financial accounts or transactions. Because most individuals do not know or recall their Vendor Code and do not have a Business/GST number, we rely on their DoB and SIN number as those unique identifying numbers.

If a person's vendor account already exists in the system with those two numbers (DoB and SIN), their account can be verified and updated with any other changes in name, address or banking information. This converts a legacy account leftover from the Freebalance migration into a master active vendor account in Fusion and eliminates duplicate profiles in the system.

If only one of those unique IDs is listed on the account – such as DoB – this may not be enough to distinguish between a current active vendor account or a legacy account left in the system.

From a practical standpoint, often vendor accounts need to be pulled up multiple times in order to complete the transaction. This is why having accurate, verified accounts in



Fusion is so important. The Vendor Update Form may not be readily available to confirm that the address and date of birth in Fusion match the individual to be paid, but seeing the SIN and DOB would confirm that the account is valid.

If a vendor account's status cannot be confirmed, Financial Controls would need to verify the individual's identity, address and banking information manually, by contacting them to request additional identification – possibly even a SIN. This delays payment of medical travel benefits to the individual and creates significant administrative burdens for the Financial Controls team.

Given the limited functionality of Fusion's data collection options, a SIN is the most reliable form of verifying one's identity and ensuring the right vendor account is being used for the transaction. In addition, Fusion is designed to store the SIN numbers in a highly secure way that limits the access to privileged individuals. This has been implemented, and it is working as designed.

This rationale demonstrates that Finance's use of SINs is not just a matter of "convenience" as perhaps characterized, but rather, as integral to the administration of the payment system itself – and by extension the activity of issuing reimbursements related to the medical travel program.

Finance is of the opinion that this activity fits within the definition of authorized collection of personal information as described in Section 40 (c) (i), as this information is necessary for the administration of the payment system:

- 40. No personal information may be collected by or for a public unless  
(c) the information relates directly to and is necessary for  
(i) an existing program or activity of the public body, or [...]*

Although Finance does not agree with your recommendation, this review provided an opportunity to test Fusion Cloud's functionality with respect to the collection of alternate forms of vendor information. Unfortunately, the system's current limitations do not permit a change in how we collect or use SIN numbers at this time. Nevertheless, Finance will continue to explore ways in which we can achieve system fidelity without requiring SINs.

Recommendation 2: Review use of Accounts Payable inbox and delete emails where information has been entered into Fusion Cloud.

Finance can confirm that the permissions for the Accounts Payable shared inbox are restricted only to Financial Controls staff required to access it in order to process payments.

Given the sensitive nature of information collected on the Vendor Update Form, Finance includes a privacy statement under the Terms and Conditions to explain how and by whom all information provided will be collected, accessed, stored, and used:

*“...The information contained in this application form will be compiled and included in the Government of Nunavut’s Financial Information System database. This information in the database will only be accessed by employees of the Government of Nunavut or agencies of the Government of Nunavut who require the information to provide payments, collection or correspondence. No personal information, other than the information now provided, will be included in the Financial Information System database...”*

This clearly limits access to this personal information to only those required for purposes under Section 40 (c)(i) that “...relate[s] directly to and is necessary for (i) an existing program or activity of the public body” which, as mentioned in response to Recommendation 1, is the administration of payments to individuals.

With respect to the second part of this recommendation, as demonstrated during your meeting with our Director of Business Transformation, Dan Carlson, information shared by e-mail is entered into Fusion and hard copies are stored in a locked filing cabinet accessible only to Financial Controls employees who require them for their job. These hard copies are retained according to the GN’s records management disposition schedule.

E-mails in the shared Accounts Payable account are filed electronically in folders within the email account once completed, with only the active or incomplete requests remaining in the inbox. E-mails are automatically archived within Outlook after one year. This enables users to only have current emails visible in their accounts. Archived e-mails are still accessible to the account holder and to Help Desk should they need to search for previous records, or complete an ATIPP request.

Although your recommendation is to “delete emails from which the relevant information has been transferred to Oracle Fusion Cloud”, GN employees, or departments, are not allowed to delete their emails. Emails are considered as public records under the GN’s Records and Information Policy. This policy outlines the responsibilities for procedures to archive or dispose of information according to ARCS and ORCS and the Information Governance Committee who makes recommendations on the records classification system and policies.

Finance (or any department) cannot unilaterally decide not to follow the Records Management Policy. There are clear authorities and penalties in the *Archives Act* that stipulate that records cannot be destroyed without authorization.

As such, Finance does not agree with part (b) of this recommendation and will not implement it.

Recommendation 3: Set a firm date for the decommissioning of the accounts-payable portion of the old ERM system and ensure that personal information contained therein is permanently and securely deleted

The accounts payable functions in Freebalance have already been decommissioned



and are accessible by a very limited number of users on a “read-only” basis.

Although we may be able to wipe some identifiable fields from the “read-only” version of Freebalance, we do need to maintain a master legacy version as a back-up should we need to repopulate Fusion.

This type of “master backup” is not uncommon. In fact, when the GN’s ransomware event occurred in 2019, the GN was able to rebuild and restore its networks and recover data using system backups.

Finance is satisfied that strictly limiting the number of users to a read-only, decommissioned Freebalance database provides sufficient protection. It is not a business priority to create a wiped copy of Freebalance – the priority is to ensure the validity of current user accounts in Fusion, as explained in our response to Recommendation 1. As such, Finance does not accept this recommendation.

Commissioner Steele, I acknowledge that this review report may be one of the last issued to the Department of Finance during your tenure. On behalf of my officials, I wish to thank you for your interest and candor in learning the “ins and outs” of our systems and departmental activities to help inform your reviews. Although we may not always accept or agree with your specific recommendations, they always lend to improvements in the services we provide to Nunavummiut – which is a goal we both aim to achieve in our respective roles.

I would like to thank you for your years of service to the Government of Nunavut and Nunavut more broadly and wish you nothing but the best in your retirement.

Sincerely,



Hon. David Akeeagok  
Acting Minister of Finance

Cc: Hon. Lorne Kusugak, Minister of Finance  
Daniel Young, Deputy Minister, Department of Finance  
Hillary Casey, Director of Corporate Policy, Department of Finance  
Mark Witzaney, Director of ATIPP, Department of Executive and Intergovernmental Affairs