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Minister of Health

Ministaat Aanniaqtailinirmut

Ministre de la Santé

September 9, 2025

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

RE: Review Report 25-288-RR NUIPC file: 24-201

Dear Commissioner,

Thank you for your letter dated June 13, 2025, and the accompanying Review Report 25-288-RR.

The Department of Health (Health) has read your analysis and recommendations in Review Report 25-288-RR regarding the use of Social Insurance Numbers (SINs) to administer medical expense reimbursement payments.

Your Review Report makes five recommendations, three of which directly pertain to the Department of Health and three of which pertain to the Department of Finance (Finance). Please see below Health's responses to your recommendations:

## Recommendations

**[45] 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.

Response: Finance will be providing you with rationale as to why their department's use of SINs is integral to the administration of the payment system itself, and in turn, issuing reimbursements related to the medical travel program. Further, 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) of the *Access to Information and Protection of Privacy Act*. Should Finance confirm with Health that the collection of a claimant's SIN is not mandatory, Health will reevaluate the collection of SINs for medical-expense reimbursement; however, at this time Health accepts Finance's rationale and will not be implementing this recommendation.

**[46] I recommend** that Health review the use of the email inbox used by the processing unit in Rankin Inlet 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 the claimant's electronic file. See paragraph 34(a).

Response: Regarding part (a) of this recommendation, Health can confirm that the shared email inboxes used by the processing unit in Rankin Inlet are restricted to the personnel who are responsible for processing at Health.

With respect to part (b) of this recommendation, Government of Nunavut employees, or departments, are not allowed to delete their emails. Emails are considered as public records under the Government of Nunavut's Records and Information Policy. This policy outlines the responsibilities for procedures to archive or dispose of information according to Administrative Records Classification System (ARCS) and Operational Records Classification System (ORCS), and the Information Governance Committee who makes recommendations on the records classification system and policies.

Health (or any Government of Nunavut 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, Health does not agree with part (b) of this recommendation and will not implement it.

**[47] I recommend** that Health set up and enforce an automatic deletion rule for medical-expense claimants' electronic files that is consistent with (a) the relevant records-retention schedule, and (b) audit requirements. See paragraph 34(b).

Response: Health does not accept this recommendation and will not implement it. Under the *Archives Act*, government bodies are not authorized to destroy any public record over which it has control without the authority of the Public Records Committee or authorized by regulation. To set up an automatic deletion rule would be contrary to the relevant section of the *Archives Act* and a breach of law. The Department of Transportation and Infrastructure Nunavut is looking at how we govern data and how we save, retain and destroy electronic records through the Information Governance Committee. We will bring forward this recommendation to that committee for consideration as it looks at how the Government of Nunavut manages electronic records.

Matna,

Hon. John Main Minister of Heath

Minister responsible for Suicide Prevention

cc: Megan Hunt, Deputy Minister, Department of Health Murugesh Narayanan, ATIPP Coordinator, Department of Health Mark Witzaney, Director of ATIPP, Department of Executive and Intergovernmental Affairs