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Building Nunavut Together
Nunavut liuqatigiingniq
Bâtir le Nunavut ensemble

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Minister of Health
Ministaat Aanniaqtailinirmut
Ministre de la Santé

October 17, 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 25-293-RR
NUIPC file: 25-147
GN file: 1025-30-2425DH2035

Dear Commissioner,

Thank you for your letter dated September 10, 2025, and the accompanying Review Report 25-293-RR.

The Department of Health (Health) has read your analysis and recommendations in Review Report 25-293-RR regarding a privacy complaint under the *Access to Information and Protection of Privacy Act*.

Your Review Report makes two recommendations for the Department of Health. Please see below Health's responses to your recommendations. This letter is intended for the public.

Recommendations

[21] I recommend that Health review whether the manager's actions created a real risk of significant harm (RROSH) to the patient. If Health concludes there was RROSH, the patient should be notified of the privacy breach.

Response: The Department of Health has reviewed this recommendation and has determined that there was no real risk of significant harm to the patient. Hence, Health will not notify the patient.

[22] I recommend that Health review the electronic medical records to which the manager (or any person holding the manager's position or acting under the manager's authority) has access; restrict or remove access where there is no operational need for it; and where access remains, develop policies and procedures, possibly including independent pre-approval, for when and how that access is used.

