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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.

Response: The Department of Health reviewed the manager's access to medical records and determined that due to the nature of the manager's duties, their access to electronic medical records cannot be restricted. However, access to other information that is not required as part of their role has been removed.

In addition, the Department of Health will also develop and implement policies and procedures, relating to independent pre-approval, for when and how the access is used.

A written notice of this decision will also be sent to the Complainant referred to in this privacy complaint file.

Matna,

Hon. John Main Minister of Heath

Minister responsible for Suicide Prevention

cc: Megan Hunt, Deputy Minister, Department of Health
Jennifer Berry, Assistant Deputy Minister of Operations, Department of Health
Murugesh Narayanan, ATIPP Coordinator, Department of Health