



For the period April 1, 2024, to March 31, 2025

June 2025

## Table of Contents

Introduction.....	3
The Year at a Glance.....	3
2024-2025 Access Request Statistics .....	4
2024-2025 Privacy Impact Assessments and Preliminary Privacy Impact Assessments .	9
2024-2025 Reported Privacy Breaches.....	10
ATIPP Training Statistics 2024-2025 .....	11

## Introduction

---

The Department of Executive and Intergovernmental Affairs (EIA) aims to table an annual report in the Legislative Assembly on the administration of the *Access to Information and Protection of Privacy (ATIPP) Act*. Although this report is not a statutory requirement, it is important that the government is accountable to the public regarding this function.

Statistics on the administration of the *ATIPP Act* are recorded individually by each public body before the information is compiled centrally in the ATIPP office within EIA.

This report provides a summary of:

- Information on important updates and work done under the ATIPP function throughout the fiscal year;
- Formal requests received by public bodies under the *ATIPP Act* between April 1, 2024, and March 31, 2025;
- Privacy Impact Assessments and Preliminary Privacy Impact Assessments received during the fiscal year; and,
- Training provided by the Territorial ATIPP Office during the fiscal year.

Previous reports of the Territorial ATIPP Office have included responses to the Information and Privacy Commissioner's (IPC) statutory annual report. Recommendations from the Standing Committee on Oversight of Government Operations and Public Accounts' "Report on the Review of the 2023-2024 Annual Report of the Information and Privacy Commissioner of Nunavut" include that this report be tabled within six months from the end of the fiscal year. In order to make this timeline, the decision was made to not respond to the IPC's Annual report, but to instead focus on the work of the Territorial ATIPP Office.

## The Year at a Glance

---

### *The Territorial ATIPP Office*

The Territorial ATIPP Office added three new positions in 2023-2024 with the intention of expanding the office to offer more substantial services to public bodies under the Act. These positions included a Director, ATIPP, and two ATIPP Specialists in addition to the existing positions of Manager ATIPP and ATIPP Analyst. As of the end of the 2024-2025 fiscal year, all positions in the division were staffed indeterminately.

The Territorial ATIPP Office has begun to offer an unprecedented level of service to public bodies under the Act, including directly taking on several large requests for information, assisting with the drafting of Privacy Impact Assessments and the investigation of privacy breaches on behalf of a public body.

The Territorial ATIPP Office has been reviewing its training materials, as well as the Privacy Management Manual, to better prepare ATIPP Coordinators and other GN employees to protect the privacy of Nunavummiut. The goal of this work is to create plain language and easy to understand resources to make the completion of Privacy Breach Reports and Privacy Impact Assessments simpler and more effective.

The Territorial ATIPP Office was busier in 2024-2025 than in previous fiscal years, with 209 new access to information requests received in the fiscal year. In addition to these 209 new requests, the Territorial ATIPP Office also received 21 new Preliminary Privacy Impact Assessments and Privacy Impact Assessments and 44 Privacy Breach Reports.

An important project during the 2024-2025 fiscal year was to look at the data the ATIPP office collects and to find ways to better present the important work we're doing and measure our success and challenges. We've noted in the relevant sections below the various ways our reporting has changed, and the reasoning behind the change.

#### *Start of the Planned ATIPP Act Review*

In several appearances before the Standing Committee on Oversight of Government Operations and Public Accounts, the Government of Nunavut committed to a full review of the *ATIPP Act* in 2025. We have begun this work and completed the information gathering stage of the review. We are currently analysing the research documents we've compiled and are working on a comprehensive report to provide to the next government following the fall election.

## 2024-2025 Access Request Statistics

### *General Trends*

In the 2024-2025 fiscal year, a total of 209 formal access to information requests were received by public bodies under the *ATIPP Act*. All requests for access to information were placed in English, though the department is prepared to handle requests in any of the official languages of Nunavut. The table below lists public bodies that received one or more formal requests. As in previous years, the Departments of Health, Education, and Justice continued to be some of the busiest. The Department of Human Resources was particularly busy during the 2024-2025 fiscal year, with more than double the number of new requests than the previous year. This increase in the number of requests for the Department of Human Resources was reflected in the type of applicant as well, with over half of all new requests for information (51%) related to a human resources related issue.

## *Categories of Applicants*

The Territorial ATIPP Office has changed how it categorizes requests, and instead of categorizing an applicant by profession, we've broken it down to the reason for the request. This change was made to better reflect drivers of the office's workload and to determine what causes increases or decreases in the number of requests. We chose broad categories so they could be compared over time and so that we could track how the Act was being used. Using broad categories allows us to make fewer assumptions about who an applicant is and allows for more straight forward sorting of requests. These categories are determined by the Territorial ATIPP Office, based on the subject of the request and other information provided by the applicant. The new categories of applicants are:

- **Human Resources:** An important addition, this new category allows us to determine how human resources related requests affect our overall workload. The Information and Privacy Commissioner has commented on the use of the ATIPP Act to address HR related conflict and disagreements and this category will allow us to track this issue more transparently. This category may include applicants from multiple departments, and not just the Department of Human Resources, and may include requests for HR investigation reports, requests for an HR file, and requests for coworker correspondence due to interpersonal conflict.
- **Media:** The ATIPP Act's purpose is to make the GN more accountable to the public, which often means members of the media making requests for information on topics of public interest. This category allows us to be transparent about how often the Act is being used for one of its stated purposes.
- **Individual – Program Related:** This category and the one after it has been added to show how often individual members of the public, versus organizations like businesses, research institutions, etc. make requests. This category includes individuals who want to know more about what the government is doing related to a program we operate, including how we use their personal information in these programs. Some examples include individuals inquiring about their medical records, their interactions with a social worker or for copies their correctional record.
- **Organization – Program Related:** Examples of these types of requests include advocates inquiring about a specific program or service the GN operates, a business inquiring as to why they weren't the successful bidder in a government tender, or a researcher from an academic institution.

## *Statistics by Community*

Following questions during the Standing Committee on Oversight of Government Operations and Public Accounts' review of the 2022-2023 Annual Report of the Information and Privacy Commissioner, we began tracking the community of residence for applicants. This is self reported by applicants on a request form and may not be captured in all cases. The ATIPP Act requires that a request be in writing, and we do not require applicants to fill out a form if they

have submitted an e-mail with the necessary information to find the records and respond to the applicant.

### *Indicators of Workload and Success*

The Territorial ATIPP Office made substantial efforts following the end of the fiscal year to work with public bodies to collect additional information to better understand the workload of public bodies and to show how we're meeting one of our legal obligations under the legislation. In addition to the number of pages of records released to applicants, we collected information on the number of workdays it took to respond to each request. We hope that going forward we can use these figures to both identify public bodies that need additional support and keep the ATIPP Office accountable by showing how quickly it is responding to applicants.

### **Number of Requests by Public Body**

<b>Public Body</b>	<b># of Requests</b>	<b>% to Total Requests</b>
Community and Government Services	18	9%
Culture and Heritage	5	2%
Economic Development and Transportation	5	2%
Education	23	11%
Environment	6	3%
Executive and Intergovernmental Affairs	8	4%
Family Services	13	6%
Finance	7	3%
Health	43	21%
Human Resources	36	17%
Justice	26	13%
Nunavut Arctic College	7	3%
Nunavut Housing Corporation	7	3%
Qulliq Energy Corporation	3	1%
Workers' Safety and Compensation Commission	2	1

<b>Total</b>	<b>209</b>	<b>99%</b>
--------------	------------	------------

Percentages have been rounded to the nearest whole number: the percentage per year may not add up to 100.

### Categories of Applicants

<b>Category</b>	<b># of Requests</b>	<b>% to Total Requests</b>
Human Resources	107	51%
Media	30	14%
Organization – Program Related	21	10%
Individual – Program Related	48	23%
Cancelled or Not Available	3	1%
<b>Total</b>	<b>209</b>	<b>99%</b>

Percentages have been rounded to the nearest whole number: the percentage per year may not add up to 100.

### Requests by Type

<b>Type</b>	<b># of Requests</b>	<b>% to Total Requests</b>
General	72	34%
Personal Information	137	65%
<b>Total</b>	<b>209</b>	<b>99%</b>

Percentages have been rounded to the nearest whole number: the percentage per year may not add up to 100.

### Requests by Community

<b>Type</b>	<b># of Requests</b>	<b>% to Total Requests</b>
Baker Lake	6	3%
Cambridge Bay	2	1%
Iqaluit	101	48%
Rankin Inlet	18	9%

Sanikiluaq	1	< 1%
Outside of Nunavut	65	31%
Unknown	16	8%
<b>Total</b>	<b>209</b>	<b>100%</b>

### Number of Pages Released

Public Body	Total # of Pages	# of Requests	Average per Request
Community and Government Services	3,296	18	183
Culture and Heritage	269	5	54
Economic Development and Transportation	59	5	12
Education	1,490	23	65
Environment	391	6	65
Executive and Intergovernmental Affairs	431	8	54
Family Services	15,934	13	1,226
Finance	831	7	119
Health	39,194 <sup>1</sup>	43	911
Human Resources	6,353	36	176
Justice	1,472	26	57
Nunavut Arctic College	910	7	130
Nunavut Housing Corporation	478	7	68
Qulliq Energy Corporation	190	3	63
Workers' Safety and Compensation Commission	46	2	23
<b>Total</b>	<b>71,344</b>	<b>209</b>	<b>341</b>

<sup>1</sup> This is driven by one large Meditech audit that had 27,361 pages of records. Because they just contained the applicant's personal information, the workload was minimal compared to some smaller requests.



## Average Time to Respond to a Request

Public Body	Average Time to Respond (Business Days)
Community and Government Services	30
Culture and Heritage	21
Economic Development and Transportation	16
Education	22
Environment	30
Executive and Intergovernmental Affairs	25
Family Services	48
Finance	14
Health	15
Human Resources	25
Justice	15
Nunavut Arctic College	19
Nunavut Housing Corporation	38
Qulliq Energy Corporation	22
Workers' Safety and Compensation Commission	78.5 <sup>2</sup>
<b>Average response time across government</b>	<b>23</b>

### 2024-2025 Privacy Impact Assessments and Preliminary Privacy Impact Assessments

In fiscal year 2024-2025, 21 Preliminary Privacy Impact Assessments (Pre-PIAs), and 1 Privacy Impact Assessment were submitted to the Territorial ATIPP Office. None of the Pre-PIAs were provided to the Information and Privacy Commissioner, but the results of the Privacy Impact Assessment were shared with them.

<sup>2</sup> This was due to one request that was complex and took a long time to complete. It's been removed from "Average response time across government" due to being an outlier.

Department	Preliminary Privacy Impact Assessments	Privacy Impact Assessments
Community and Government Services	2	0
Education	3	0
Finance	4	1
Health	9	0
Human Resources	1	0
Nunavut Housing Corporation	2	0
<b>Total</b>	<b>21</b>	<b>1</b>

## 2024-2025 Reported Privacy Breaches

The Territorial ATIPP Office, for the first time, is releasing the number of privacy breaches reported to our office. It is important to stress that the figures provided are not the complete picture of how often privacy breaches occur in the Government of Nunavut. The numbers the office has are just the ones that have been reported. Underreporting of privacy breaches has been a concern of the Information and Privacy Commissioner in the past and has been a topic of concern during reviews of his Annual Reports by the Standing Committee on Oversight of Government Operations and Public Accounts. Privacy breaches are most often accidents and occur when someone collects, uses, discloses or loses personal information without authorization. An employee, even if they address the breach, may not know when or how to report the breach officially under the *ATIPP Act*. Training provided by the Territorial ATIPP Office, the Information Management and Information Technology Division of the Department of Transportation and Infrastructure Nunavut and the Department of Health all include information on the mandatory reporting of privacy breaches. We hope that as more people take the training, more privacy breaches are reported to our office and to the Information and Privacy Commissioner.

Breaches must be reported to the Information and Privacy Commissioner when they are found to be “material”. A department, in consultation with the Territorial ATIPP Office determines if breaches are material based on the following four factors:

- (a) The sensitivity of the personal information;
- (b) The number of individuals whose personal information is involved;
- (c) The likelihood of harm to the individual whose personal information is involved; and,
- (d) An assessment by the public body whether the cause of the breach is a systemic problem.

If the department or the Territorial ATIPP Office is unsure whether or not a breach is material, we err on the side of reporting to the Information and Privacy Commissioner.

Department	Reported Breaches	Number of Material Breaches
<b>Community and Government Services</b>	1	0
Education	7	3
Executive and Intergovernmental Affairs	1	0
Family Services	4	1
Finance	7	4
Health	21	10
Justice	2	1
Nunavut Arctic College	1	0
Nunavut Housing Corporation	1	0
<b>Total</b>	<b>45</b>	<b>19</b>

## ATIPP Training Statistics 2024-2025

The GN is committed to the successful implementation of the *ATIPP Act* throughout all public bodies. Training sessions on the legislation are provided to employees throughout each fiscal year, the majority of which are done through the Territorial ATIPP Office.

Additional training has been added by the Department of Transportation and Infrastructure Nunavut focused on privacy and security. A module of the online training program “Do your part – be Privacy Smart!” is focused specifically on privacy and the workplace. This training is available to all Government of Nunavut staff. The training was launched in June of 2024.

The Department of Health has also developed in-house privacy training that is available to all health staff as of April 2023. It focuses on teaching health care staff about their obligations to protect patient privacy and to use systems like Meditech responsibly. In 2024-2025, 460 users completed the Department of Health training.

Date	Location	Audience	Participants	Type	Presenter
4-Apr-24	Iqaluit	Various GN employees	1	ATIPP Coordinator Training - Information Requests	ATIPP Director
17-Apr-24	Online	Various GN employees	17	Basic Introduction to ATIPP	ATIPP Director

22-Apr-24	Iqaluit	Various GN Employees	5	ATIPP Coordinator Training	ATIPP Director
23-May-24	Iqaluit	Various GN employees	2	ATIPP Coordinator Training - Information Requests	ATIPP Director
29-Jun-24	Online	QEC	1	ATIPP Coordinator Training	ATIPP Director
17-Jul-24	Iqaluit	Various GN Employees	10	Basic Introduction to ATIPP	ATIPP Director
1-Aug-24	Iqaluit	Various GN Employees	3	ATIPP Coordinator Training - Information Requests	ATIPP Director
7-Aug-24	Online	Family Services Managers	12	Basic Introduction to ATIPP	ATIPP Director
8-Aug-24	Iqaluit	QEC	1	ATIPP Coordinator Training - Information Requests	ATIPP Advisor
14-Aug-24	Online	Family Services	14	Basic Introduction to ATIPP	ATIPP Director
19-Aug	Online	Family Services	13	Basic Introduction to ATIPP	ATIPP Advisor

23-Sep-24	Online	Oral Health Programs Teams	11	Basic Introduction to ATIPP	ATIPP Director
26-Sep-24	Iqaluit	Records Management Training	7	Basic Introduction to ATIPP	ATIPP Director
09-Oct-24	Online	Various GN Employees	7	Basic Introduction to ATIPP	ATIPP Advisor
19-Nov-24	Online	Various GN Employees	27	Basic Introduction to ATIPP	ATIPP Director
26-Nov-24	Iqaluit	Various GN Employees	3	ATIPP Coordinator Training - Information Requests	ATIPP Director
20-Dec-24	Iqaluit	Culture and Heritage	1	ATIPP Coordinator Training - Information Requests	ATIPP Director
11-Feb-25	Iqaluit	Corrections Managers	16	ATIPP Coordinator Training for Corrections Managers	ATIPP Advisor, ATIPP Specialist
18-Feb-25	Iqaluit	Various GN Employees	9	Basic Introduction to ATIPP	ATIPP Director
19-Feb-25	Iqaluit	Various GN Employees	2	ATIPP Coordinator Training - Information Requests	ATIPP Advisor
19-Feb-25	Iqaluit	Various GN Employees	8	Basic Introduction to ATIPP	ATIPP Advisor
25-Feb-25	Iqaluit	Various GN Employees	9	Basic Introduction to ATIPP	ATIPP Director
28-Feb-25	Iqaluit	NHC	2	ATIPP Coordinator Training	ATIPP Director

20-Mar-25	Iqaluit	NHC, WSCC	3	ATIPP Coordinator Training	ATIPP Advisor
21-Mar-25	Iqaluit	Corrections Health Records	1	ATIPP Training for records holders	ATIPP Advisor
<b>Total</b>			<b>185</b>		