

## Summary of Department of Service Nova Scotia and Internal Services Implementation of Recommendations in IR19-01 (Department formerly known as Department of Internal Services)

| <b>Recommendation #1: Strengthen privacy leadership in government and due diligence in privacy</b>  |             |
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| impact assessments  |             |
| The Department of Internal Services' implementation activities include:   | In progress |
| • Issuing a directive from the Chief Information Officer requiring tech projects to assess and  |             |
| mitigate risks before going live;   |             |
| • Publishing a detailed guide to writing privacy impact assessments;  |             |
| • Training IAP Services staff in a Canadian Information Access and Privacy certification  |             |
| program; and,   |             |
| • Initiating a Privacy Forum across multiple government departments.  |             |
| To complete this recommendation the Department must:  |             |
| <ul> <li>To complete this recommendation the Department must:</li> <li>Demonstrate that the privacy impact assessment process is producing more diligent</li> </ul>                                   |             |
| • Demonstrate that the privacy impact assessment process is producing more different<br>assessments and that the Privacy Forum is effective in strengthening privacy leadership.                      |             |
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| Recommendation #2: Contain the breaches   |             |
| The Department of Internal Services received confirmation from Halifax Regional Police that the   | Complete    |
| records on the computer used in breach #1 will not be returned to the individual. The Department  |             |
| followed up on breaches #2-12 and obtained a signed statutory declaration from the responsible individual attesting that no copies of the records were made or shared and that the device used during |             |
| the breach was destroyed. The Department completed two scans of the internet and found no evidence  |             |
| that the breached records were posted online and it plans to conduct another scan after one year.   |             |
| Recommendation #3: Correct under notification of affected individuals   |             |
| The Department of Internal Services completed a risk assessment for additional affected individuals   | Complete    |
| who were not originally notified. The risk assessment took into account that the person who acted in  | Complete    |
| breaches #2-12 was identified and provided assurances along with the assurances provided by the   |             |
| Halifax Regional Police. The Department determined that the risk to other affected individuals was so   |             |
| low that it does not constitute a risk of harm or embarrassment and therefore decided not to notify any   |             |
| additional affected individuals.  |             |
| Recommendation #4: Conduct internal post-incident review  |             |
| The Department of Internal Services' implementation activities include:   | Complete    |
| • Messaging all members of the Department with a link to IR19-01, encouraging all to read it;   | , î         |
| • Sending a message from the Deputy Minister to all executive directors in the Department and   |             |
| to all staff involved in the implementation of IT projects to highlight their role in due   |             |
| diligence and carrying out the Department's action plan in response to the breaches.  |             |
| • Sending a message from the Deputy Minister to Deputy Ministers and other colleagues across  |             |
| government with a link to IR19-01, encouraging all to read it;  |             |
| • Giving a follow-up presentation to all information and computer technology services staff   |             |
| about the report and the Department's action plan;  |             |
| • Receiving a consultant's final report on post-incident review.  |             |
| Recommendation #5: Review other technologies for security vulnerabilities   |             |
| The Department of Internal Services has identified a set of asset, technology, and information  | In progress |
| inventories that already exist which it will use to begin the assessment of security vulnerabilities and  |             |
| to create a plan.   |             |
|   |             |

| <ul> <li>To complete this recommendation the Department must:</li> <li>Identify the assets and technologies that are most vulnerable and create a plan to mitigate those first with firm commitments and deadlines; and</li> <li>Create a longer-term plan to complete the assessments and risk mitigation for all government assets and technologies.</li> </ul>  |             |
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| Recommendation #6: Clarify and strengthen the role of the Architecture Review Board  |             |
| The Department of Internal Services received a consultant's report on the role of the Architecture<br>Review Board. The chief information officer issued a directive to the Department requiring all<br>projects and initiatives that introduce new architecture or change existing architecture, data or data<br>flow for both on-premise and externally hosted solutions be reviewed and approved by the<br>Architecture Review Board. | In progress |
| <ul> <li>To complete this recommendation the Department must:</li> <li>Complete the review of the Architecture Review Board and implement terms of reference, guidelines, process requirements and standards to support a stronger role for the Architecture Review Board.</li> </ul>  |             |