



Highways and Public Works
PO Box 2703, Whitehorse, Yukon Y1A 2C6

Via Secure File Transfer e-mail

June 6, 2024

Jason Pedlar
Information and Privacy Commissioner

Re: Response on Recommendations – Privacy Compliance Audit: ATP-CMP-2023-02-074

On May 15, 2024, the Public Body received the Information and Privacy Commissioner's Privacy Compliance Audit Report regarding Physical Records Destruction Process in the department of Highways and Public Works.. The report provided the six below recommendations:

Recommendation 1: Establish a written policy and procedure for employees on the destruction of records, which should include checklists like those used for the stored records process.

Recommendation 2: Conduct regular internal audits to evaluate the effectiveness of their written policies regarding the disposal of temporary records.

Recommendation 3: Incorporate regular audits at specified intervals to ensure the effectiveness of the record tracking and scheduling process for destruction.

Recommendation 4: Develop a data classification system for the personal information that it holds and reference the appropriate class of personal information in the policies and procedures referred to above.

Recommendation 5: Consider using a cross-cut shredder for transitory records containing sensitive personal information, in addition to the use of a cross-cut shredder for non-transitory records.

Recommendation 6: Assess whether a more secure shredder is appropriate for highly sensitive information.

The department of Highways and Public Works has accepted all six of the recommendations, as follows:

Recommendation 1: A written policy and procedure for employees on the destruction of records will be written by the end of June and implemented by the end of the calendar year.

Recommendation 2: Once the policy is implemented Highways and Public Works will conduct quarterly audits to evaluate the effectiveness of their written policies regarding the disposal of temporary records.

Recommendation 3: We will perform quarterly audits to ensure the effectiveness of the record tracking and scheduling process.

Recommendation 4: We will accept this recommendation and use existing retention and disposition schedules with the addition of a Sensitivity column.

Recommendation 5: We will begin investigating locations that do not have access to secure shredding, any location that has paper records that may require shredding will have access to a cross cut shredder.

Recommendation 6: We will investigate more secure shredding options and make sure Highways and Public Works offices are aware of the extra secure shredding that is required for highly sensitive paper records.

Sincerely,



Catherine Harwood
Deputy Minister
Department of Highways and Public Works