

Chapter 32

Finance – Public Employees Benefits Agency – Securing Personal Information

1.0 MAIN POINTS

The Ministry of Finance, through its Public Employees Benefits Agency (PEBA), implemented the two outstanding recommendations from our 2016 audit related to its processes to secure personal information.

It made procedures used to secure personal information readily accessible to its staff and implemented a policy requiring periodic update of its non-IT policies used to secure personal information.

2.0 INTRODUCTION

The Ministry of Finance, through its branch called PEBA, operates and administers various government pension and benefit plans for employees of the Government of Saskatchewan and certain employees of municipal governments.¹ At July 2018, PEBA operated and administered 34 such plans.² It serves about 90,000 members and beneficiaries with a staff of about 136 full time equivalent employees at a cost of approximately \$17.6 million annually.³

In its operation and administration of these plans, PEBA must maintain personal information (e.g., medical records, coroner reports, social insurance numbers, marriage certificates, birth certificates, death certificates, and banking information).⁴ It must keep information entrusted to it confidential (secure).

Our *2016 Report – Volume 2*, Chapter 26 concluded that for the 12-month period ended July 31, 2016, PEBA had effective processes to secure pension and benefit plan participants' personal information, except in the areas of our two recommendations.⁵ This chapter describes our follow-up of management's actions on these recommendations.

To conduct this audit engagement, we followed the standards for assurance engagements published in the *CPA Canada Handbook – Assurance* (CSAE 3001). To evaluate PEBA's progress towards meeting our recommendations, we used the relevant criteria from the original audit. PEBA's management agreed with the criteria in the original audit. We reviewed PEBA's related approved policies and procedures, reviewed minutes from meetings of its senior management, and interviewed relevant PEBA staff.

3.0 STATUS OF RECOMMENDATIONS

This section sets out each recommendation including the date on which the Standing Committee on Public Accounts agreed to the recommendation, the status of the

¹ *The Financial Administration Act, 1993*, s. 64(1).

² www.peba.gov.sk.ca/about/PEBA.html. (29 June 2018).

³ Public Employee Benefits Agency Revolving Fund Financial Statements for the year ended March 31, 2018, and employee information provided by PEBA management on June 29, 2018.

⁴ *The Financial Administration Act, 1993*, s. 64 (1).

⁵ Pension and benefit plan participants include all active, inactive and deferred members, pensioners, surviving spouses, and dependents.



recommendation at July 16, 2018, and PEBA's actions up to that date. We found that it implemented both recommendations.

3.1 Procedures to Secure Personal Information Updated and Accessible to Staff

We recommended that the Public Employees Benefits Agency maintain its procedures used to secure personal information in a manner that is readily accessible to its staff (2016 Report – Volume 2; Public Accounts Committee agreement March 7, 2017)

Status – Implemented

PEBA's approved policies and procedures used to secure personal information are readily available to staff on its intranet, and staff are required to annually confirm awareness of PEBA's security policies.

In late October 2016, PEBA updated its privacy policy to provide formal and written guidance to staff about providing participants with physical access to their personal files.⁶ Under its revised policies, PEBA staff must confirm annually, in writing, their awareness of and familiarity with PEBA's privacy policies. This confirmation process reinforces that staff are knowledgeable of the policies and their location.

All staff in our sample confirmed, in writing, their awareness of PEBA's privacy policies as required.

3.2 Security Policies Reviewed Annually

We recommended that the Public Employees Benefits Agency require periodic review and update of its non-IT security policies to keep personal information secure (2016 Report – Volume 2; Public Accounts Committee agreement March 7, 2017)

Status – Implemented

PEBA established a process to annually review its non-IT security policies used to keep personal information of plan participants secure.

On August 31, 2017, PEBA approved a policy requiring the division responsible for the policy to do an annual review of all of its policies (IT and non-IT) for accuracy and completeness. Under the revised policy, PEBA's senior management must approve significant updates or changes to policies.

PEBA maintains a listing of all of its policies along with their effective date, date of last review, and date of next review.

We found that this listing included all IT and non-IT security policies, and PEBA had reviewed, updated, and approved policies as expected.

⁶ Our 2016 audit report noted that this guidance was previously only documented informally in an email from 2010 (2016 Report – Volume 2, p. 149).