

Privacy compliance project quarterly report – October to December 2025

This project provides an opportunity to build and support a culture that prioritises appropriate management and protection of sensitive and personal information.

Scope: To address the range of issues and the 19 actions that need to be taken to address them as provided for in the Privacy Commissioner's compliance notice dated 26 May.

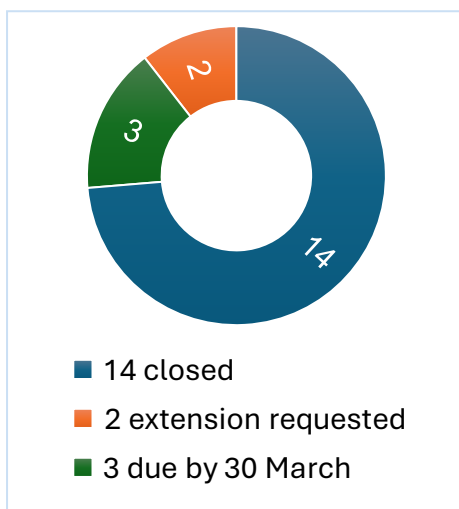
Including identifying more long-term change management opportunities to affect the organisational culture shift required in relation to privacy.

Note: The notice was given in response to repeated notifiable privacy breach reports made under Part 6(1) of the Privacy Act 2020.

Project sponsor: Chief Privacy Officer, DCE System Leadership

Senior responsible owner: Privacy Manager

Status of the 19 actions required by the Office of the Privacy Commissioner, in the compliance notice dated 26 May 2025



Overall project summary and plan for 2026

The project team has completed its work, and ongoing activities and risks will now be managed by the Chief Privacy Officer and Privacy Manager. This will be done through a refreshed Privacy Improvement Plan, which will be extended to 30 June 2027 to:

- Address the remaining actions from the compliance notice.

- Continue post-project activities, primarily focused on monitoring privacy requirements and improving organisational processes.
- Develop and implement a framework and supporting technological tools for assurance activities.
- Place greater emphasis on consistent communication about privacy across the organisation.

Overall project summary for period Oct – Dec 2025

Project objective	Summary for period Oct – Dec 2025
<p>i. Uplift staff skills and capability summary:</p> <p>Actions 1, 2, 3 and 4</p>	<p>Actions 2, 3 and 4 now closed.</p> <p>Action 1 - scheduled trainings (due March 2026) are progressing well with 57 completed. The attendance survey has been sent to 779 attendees; to date, the overall feedback has been positive with most saying the training was relevant and 80 percent said very relevant to their mahi.</p>
<p>ii. Strengthen information access settings summary:</p> <p>Actions 5, 6, 7, 8, 9 and 10</p>	<p>Actions 5, 6, 9 and 10 now closed.</p> <p>An extension for Action 7 has been requested:</p> <ul style="list-style-type: none"> • the taskforce to clear the backlog of Customer Information Requests has been recruited. • Additional funding to extend the taskforce beyond 30 June 2026 and increase is further is being sought. • Scanner procurement will be completed in February/March 2026. • Commissioned work to explore technological opportunities for increasing process efficiency has commenced. <p>In this way, the risk that information response times remain outside required limits is being addressed, but a permanent solution has yet to be found.</p> <p>Under Action 8, all remaining role-based tasks will be delivered through the FTSU programme.</p>
<p>iii. Strengthen oversight of service providers summary:</p> <p>Actions 11, 12 and 13.</p>	<p>These actions are now closed. First 189 contract renewed with strengthened privacy clauses. Contracts will be updated as they come up for renewal, and we will continue to report on this via the refreshed Privacy Improvement Plan. Action 13 – the auditing processes in place presented and discussed with the OPC.</p>

<p>iv. Strengthen accountability and reporting of privacy incidents summary:</p> <p>Actions 14- 19.</p>	<p>Actions 14, 15, 16 and 17 are now closed.</p> <p>Actions 18 and 19 – technological elements supporting these actions are addressed in the refreshed Privacy Improvement Plan (see below). The draft business case (BC) for increased resource in the Privacy team was discussed by PSG but has been put on hold until more complex reorganisation of the Oranga Tamariki resources. An extension for action 18 has therefore been requested.</p>
--	---

Updates by action: Oct – Dec 2025

Uplift staff skills and capability actions	Update against actions - see next slide for detail on closed actions	Due date
<p>Item 1(a)(1-4): Provide direction to staff on the interaction of the Privacy Act with the Family Violence Act and the Oranga Tamariki Act and any associated regulations (Action 1)</p> <ul style="list-style-type: none"> - tailored to both back-office enabling staff and frontline social workers. (Action 2) - provided to new staff as part of induction and prior to gaining system access to personal information. (Action 3) - repeated for all staff at appropriate intervals (e.g. annually), with additional refresher training required for specific groups and/or when privacy incidents occur. (Action 4) 	<p>Frontline training has been developed, and delivery is progressing well. Out of all 58 sites scheduled, 57 training sessions have been delivered, plus an additional five national office teams.</p> <p>Nine youth justice residences are yet to have training scheduled - this will happen in early 2026.</p> <p>The first three trainings have been completed for Puāwai (induction) and will continue every 10 weeks within each new session.</p> <p>A memo has been provided to OPC with evidence for the closure of Actions 2, 3 and 4 of this section, along with training slides, and privacy certification and annual recertification information.</p>	<p>Action 1 due 30 March 2026</p> <p>Actions 2,3,4 closed</p>

Strengthen information access settings	Update against actions	Due date
Item ii(a)(1): Complete an assessment of the levels of sensitivity of all types of personal information held ('Privacy Classification System') which includes a record of the location or system where it is stored. (Action 5)	Memo provided to OPC on 19 Nov with evidence for closure, referencing the assessment done to develop a Privacy Classification System.	Action 5 closed
Items ii(a)(2) and ii(b)(1): Develop and deliver business rules/technical settings for role-based access (Annual privacy declaration; Automated removal of access; Business rules/resolution of existing inappropriate access to information). (Action 6/8)	The CYRAS declaration process has been developed and is being embedded into business practices. The memo closing Action 6 and providing an update on Action 8 has been provided as evidence to OPC.	Action 6 closed Action 8 due 30 March 2026
Item ii(a)(3): Responding to information disclosure requests – to be handled appropriately and within the required timeframes (potential efficiencies assessed, business case/memo for FTE increase required).(Action 7)	Six Sigma review of Customer Information Request (CIR) process completed but did not identify major efficiencies. Investigation underway to see if new technologies / AI could help to streamline the CIR processes. Scanners due Feb/Mar should address a bottleneck. The taskforce to clear the privacy request backlog has been approved by Te Riu and the CE. New staff will on board in tranches in January. Approval to increase permanent headcount of CIR team has not been agreed at this time, with further investigation required. Update provided to OPC on 19 November.	Action 7 - extension requested
Items ii(b)(2) Implement an audit log and process for the proactive monitoring of IT security access controls (Action 9) and ii(b)(3) Develop and deliver a proactive monitoring schedule and reporting framework that includes adjusting and removing access as appropriate. (Action 10)	Memo provided to OPC on 19 Nov with evidence for closure. Automatic removal of access to CYRAS after three months of inactivity has been implemented, also a View History tab on CYRAS records, and removal of access as appropriate from HR report showing changing roles and kaimahi leaving the organisation. Work to embed new reports in business processes is underway.	Actions 9 and 10 closed

Strengthen oversight of service providers	Update against actions	Due date
Item iii(a)(1): Developing and maintaining an inventory of the allocation and use of devices to non-Oranga Tamariki personnel which also records the information access settings for each person. (Action 11)	Memo provided to OPC on 19 Nov with evidence for closure, including summary of information available in the inventory. Further work is planned to provide assurance over the end-to-end process for third-party access to sensitive information.	Action 11 closed
Item iii(a)(2): review and strengthen contractual requirements for non-Oranga Tamariki staff, including secure information management and disposal practices and prompt privacy breach reporting requirements. (Action 12)	Memo provided to OPC on 19 Nov with evidence for closure and discussing extension, including updated pro forma contract with strengthened privacy clauses, and schedule for contract updates. First 189 contract renewed with strengthened privacy clauses.	Action 12 closed
Item iii (b) 1): Developing a schedule of regular audits of the privacy policies and practices of those providers to ensure the required privacy standards are maintained. (Action 13)	Memo provided to OPC on 19 Nov with evidence for closure, including details of the privacy requirements providers need to meet to get accreditation, and the process for following up Te Kāhui Kāhu audits where issues are identified. The audit process was further discussed during the December conversation with the OPC.	Action 13 closed
Strengthen accountability and reporting of privacy incidents	Update against actions	Due date
Item iv(a)(1): Progress with the Privacy Improvement Plan (PIP) delivery until June 2025, and Oranga Tamariki longer-term responses to the Privacy Review findings post June 2025. (Action 14)	Memo provided to OPC on 19 Nov with evidence for closure of action 14. A new Privacy Improvement Plan is now being developed following the completion of the majority of compliance notice requirements/actions and will also include some longer-term responses to the Privacy Review findings.	Action 14 closed
Item iv(a)(2): A documented explicit requirement for all staff and non-Oranga Tamariki personnel with access to Oranga Tamariki personal information to report privacy incidents promptly to the privacy team. (Action 15)	Memo provided to OPC on 19 Nov with evidence for closure of action 15. The Privacy Policy has been updated. New Standard Operating Procedure will replace current Privacy Guidelines. A new privacy training module explaining the need to report privacy breaches to the Privacy Team was rolled out in June 2025. This module is	Action 15 closed

	<p>compulsory for all staff and is part of the Privacy Certification requirement for access to personal information. A copy of the training module was provided on 15 August as evidence of completion.</p>	
Strengthen accountability and reporting of privacy incidents (cont'd)	Update against actions	Due date
<p>Item iv(a)(3): Privacy incidents (breaches and near-miss) occurring, as well as insights and trend analysis. (Action 16)</p>	<p>Memo provided to OPC on 19 Nov with evidence for closure of action 16. Counts of privacy incidents, including both breaches and near-misses are reported to the Risk and Assurance Committee and the OPC. Trend analysis is included in the cover letter.</p>	<p>Action 16 closed</p>
<p>Item iv(a)(4): Completion rates for training uptake by all staff and contractors, aligned to an identified completion target for all personnel. (Action 17)</p>	<p>Memo provided to OPC on 19 Nov with evidence for closure of action 17. The target for completion of mandatory privacy training is 100%. A checklist and the privacy declaration links this learning to relevant content in the Acceptable Use of Oranga Tamariki Technology and Services and the Code of Conduct.</p> <p>Managers have access to training records and are responsible for following up with team members who have not completed their training. Automated reminders are also sent by the myLearn system.</p>	<p>Action 17 closed</p>
<p>Item iv(a)(5): Develop and deliver a privacy reporting performance framework that includes implementation of controls and recommendations identified in Privacy Impact Assessments. (Action 18)</p>	<p>The draft business case (BC) seeking the approval/funding to stand up a privacy assurance function, uplifting information sharing advice function and the Privacy operations team to cover the increased amount of operational work has been put on hold until more complex reorganisation of the Oranga Tamariki resources. The work to build some foundational tools for assurance will start in early 2026.</p> <p>Extension to Action 18 is being sought, which should allow to build necessary tools and bring onboard resources to monitor risks recognised in Privacy Impact Assessments.</p>	<p>Action 18 extension requested</p>

<p>Item iv(a)(6) Develop and deliver a privacy reporting performance framework that includes the effectiveness of the information access control settings. (Action 19)</p>	<p>This action has been addressed in Privacy Improvement Plan. It is also partially dependent on the BC discussed above, as to the staff monitoring the effectiveness.</p> <p>Privacy Improvement Plan identifies the way to embed the new controls over information access and aims to implement some of those measures.</p>	<p>Action 19 due 30 March 2026</p>
--	---	--