

Privacy compliance project quarterly report – July to September 2025

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

Project 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 Commissioners compliance notice dated 26 May.

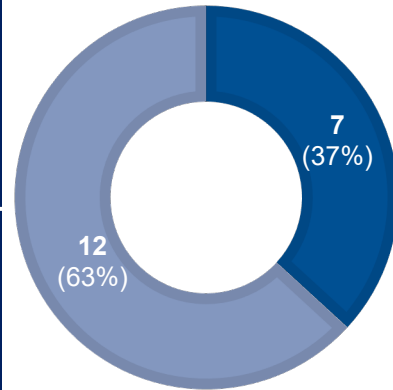
Including identifying more long-term change management opportunities to affect the organisational culture shift required in relation to privacy.

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

Action status

■ Completed ■ In Progress



Project objective

Overarching update

i. Uplift staff skills and capability

Three of four items have been completed. Scheduled trainings (i(a)(1)) continue to be delivered and are progressing well with 36 completed, a Privacy training survey is underway.

ii. Strengthen information access settings

All items continue to progress towards closure. Business processes are required to be developed to support this. However, we do need to signal that, ii(a)(3) concerning the uplift of CIR capabilities (information requests) will not be completed by 31 October.

iii. Strengthen oversight of service providers

All items are progressing well in this area. However, the iii(a)(2) item to strengthen privacy clauses will not be in place until agreements are renewed from November 2025 onwards. This deliverable involves challenges due to the complexity of working across the social sector.

iv. Strengthen accountability and reporting of privacy incidents

Four items (iv(a)(1), (2), (3) and (4)) are now completed. The draft Business case for iv(a)(5) and (6) has been for initial review and will be reviewed further throughout October.

Overall project summary

The project is progressing well overall, with key milestones being met. However, certain areas are experiencing delivery challenges that are being actively managed.

Oranga Tamariki has a large number of projects underway, which have change implications to both frontline and National Office staff and in some cases also impacts third party providers. Every opportunity is being taken to identify dependencies and align communications both internally and externally to ensure the impact to staff is managed effectively. For any positive culture shift to be achieved and to embed a more privacy driven culture, change needs to be considered across the whole portfolio.

Sponsor/DCE: Enabling Communities

- Enabling communities
- Integrated voices
- Disability strategy

Sponsor/DCE: Youth Justice (YJ) Services and Residential Care

- Professionalisation of the residential workforce
- Increasing capacity in secure residences

- Military-style academies (MSA): Pilot and MSA 2.0
- Legislation development and implementation:
 - Improving safety in secure YJ residences (searches + lockdowns)
 - RSYO and detentions
- Bush rapid review
- Graduated response model

Sponsor/DCE: System Leadership

- Enhancing data services
- Data modernisation
- Dame Karen Poutasi response

Sponsor/DCE: Chief Social Worker and Professional Practice

- Embedding our practice system
- Frontline technology systems upgrade
- Social worker workforce analysis

Sponsor/DCE: People Culture and Enabling Services

- Critical risk
- Corporate systems improvements
- Infrastructure remediation

Update by action – July to September 2025

i. Uplift staff skills and capability actions	Update against actions	Due date
Item i(a)(1): Provide direction to staff on the interaction of the Privacy Act 2002 with the Family Violence Act and the Oranga Tamariki Act and any associated regulations. (Action 1)	Frontline training focused on responsible information sharing and the legislation that enables it has been developed, and delivery is progressing well with 57 of 58 sites on the schedule. 36 scheduled training sessions have been delivered, plus an additional five national office support teams have received the training.	30 March 2026
ii. 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 information held ('Privacy Classification System') including location or system where stored. (Action 5)	The inventory of what information is held where, is going well. 40 interviews have been completed, and the first draft was delivered at the end of September.	31 October
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)	Annual privacy declaration in progress. Automated removal of access for inactive accounts (three months) has been completed. Business rules are currently being worked through.	31 October and 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)	A funding memo has been developed with HR and Finance input, and is due to go to the CE at the beginning of October. A taskforce to clear the backlog of Privacy Act requests is expected to come on board in tranches. The overall uplift to the team requires further investigation. Scanner procurement has been separated from other requirements and is underway and expected to be in place in December/January.	31 October
Item ii(b)(2): Implement an audit log and process for the proactive monitoring of IT security access controls. (Action 9)	New unusual or unauthorised access to records reporting has been developed. We are currently working on the associated business processes, including establishing a framework for periodic reporting to managers.	31 October
Item ii(b)(3): Develop and deliver a proactive monitoring schedule and reporting framework that includes adjusting and removing CYRAS access as appropriate. (Action 10)	An unusual activity report has been developed, along with a query tool for managers who manage CYRAS users, business processes/rules to support these are still being defined. Similarly, a report enabling investigation has also had first phase development completed and is now under phase two development.	31 October
iii. Strengthen oversight of service providers	Update against actions	Due date
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)	A letter is going to providers this month that talks to the strengthened focus on privacy, the information sharing standard, privacy training requirements and changes to CYRAS. The strengthened privacy clauses; information sharing clauses; and CYRAS terms of use clauses are to be communicated with providers and will possibly be rolled out as Agreements are renewed from November 2025.	31 October
Item iii(b)(1): Incorporate regular privacy policies and practices audit requirements into contractual arrangements. (Action 13)	A register of third-party providers is maintained by the Contract Monitoring and Compliance team with monitoring and assurance quarterly reviews in place. The process has been written up and provided in a memo for PSG endorsement.	30 March 2026

Update by action continued – July to September 2025

iv. Strengthen accountability and reporting of privacy incidents	Update against actions	
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)	A draft Business Case is in development to secure funding for a more comprehensive privacy assurance function, uplift to the Privacy team, and to strengthen information sharing.	31 October
Item iv(a)(6): Develop and deliver a privacy reporting performance framework that includes the effectiveness of the information access control settings. (Action 19)	Completion of this action depends on the Business Case. An assurance report assessing control effectiveness is recommended, using the proposed reporting framework.	30 March 2026

Evidence of completed actions or activities – July to September 2025

i. Uplift staff skills and capability actions	iii. Strengthen oversight of service providers
Item i(a)(1): Training slides provided to OPC 14 August as evidence of completion. (Action 2)	Item iii(a)(1): Inventory of allocation and use of devices to non-Oranga Tamariki personnel including information access settings for each person has been developed. Future use and business processes are still being developed. (Action 11)
Item i(a)(3): Privacy Certification Declaration provided to OPC 15 August as evidence of completion. (Action 3)	
Item i(a)(4): Recertification Quiz Question Library provided to OPC 15 August as evidence of completion. (Action 4)	
ii. Strengthen information access settings	iv. Strengthen accountability and reporting of privacy incidents
Item ii(a)(3): Action 1 of this item – Six Sigma report assessing potential efficiencies within processes and tools provided to OPC 18 August as evidence of progress. (Action 7)	Item iv(a)(1): Completed. (Action 14)
Item ii(b)(1): CYRAS release notes and PMOI report provided to OPC 18 August as evidence of progress. FTSU discussion paper and RFP forms provided to OPC 18 August as evidence of progress. (Action 8)	Item iv(a)(2): Completed, copy of compulsory training module provided to OPC. (Action 15)
Item ii(b)(2): View history tab released 10 August. CYRAS release notes and PMOI report provided to OPC 18 August as evidence of progress. (Action 9)	Item iv(a)(3): Privacy breach reporting to include insights and trend analysis is in place. (Action 16)
Item ii(b)(3): Automatic access removal after three months of inactivity has been implemented. CYRAS release notes and PMOI report provided to OPC 18 August as evidence of progress. (Action 10)	Item iv(a)(4): Training completion rates are being collected and will be provided through a memo that will cover items 1(a)(1), (2), (3) and (4) in more detail. (Action 17)