

5 December 2017



Mr David Lawson  
[fyi-request-6843-e6231167@requests.fyi.org.nz](mailto:fyi-request-6843-e6231167@requests.fyi.org.nz)

Dear Mr Lawson

Reference: 0051012

### Official Information Act Request

Thank you for your request of 17 November 2017, asking for the following information under the Official Information Act 1982:

*Request 1:*

*(a) I welcome the provision to me through the [www.fyi.org.nz](http://www.fyi.org.nz), a complete copy of the comprehensive Privacy Strategy ACC adopted in 2013 as referred to in the Human Rights Review Tribunal ruling referred to above under [26.3].*

*(b) please confirm the exact 2013 date that ACC formally adopted their comprehensive Privacy Strategy.*

*Request 2:*

*I welcome the provision to me through the [www.fyi.org.nz](http://www.fyi.org.nz), a complete copy of the ACC privacy policy that was put into effect as a direct result of ACC's comprehensive Privacy Strategy being adopted by ACC in 2013, and any amendments and or iterations that were introduced by ACC that occurred prior to ACC superseding their comprehensive Privacy Strategy with ACC's Privacy Maturity Plan.*

*Request 3:*

*(a) I welcome the provision to me through the [www.fyi.org.nz](http://www.fyi.org.nz), a complete copy of the ACC Privacy Maturity Plan which*

*1. formalises ACC's approach to continue to improve ACC's privacy maturity between now and 2020, and*

*2. superseded the comprehensive Privacy Strategy adopted by ACC in 2013,*

*and any and all amendments and or iterations that were introduced by ACC that occurred following the introduction of ACC's Privacy Maturity Plan.*

*(b) please confirm the exact date that ACC formally adopted their ACC Privacy Maturity Plan.*

### Privacy Strategy

A copy of ACC's Privacy Strategy is attached as Appendix One.

The Privacy Strategy was approved by the ACC Board following the submission of a board paper on 27 June 2013. Training in the use of the Privacy Strategy was rolled out to the branches over the following months.

### **Privacy Policy**

ACC's Privacy Policy is publicly available on our website. You can find it, and other documents that may be of interest to you, through the following link:

<https://www.acc.co.nz/privacy/our-privacy-framework/?smooth-scroll=content-after-navs>

There were no documented amendments of the Privacy Policy between 2013 and 2016, when the Privacy Maturity Plan was implemented.

### **Privacy Maturity Plan**

ACC's Privacy Maturity Plan is publicly available through the link provided above. There have been no documented amendments of the Privacy Maturity Plan to date.

The Privacy Maturity Plan was approved by the ACC Board following the submission of a board paper on 28 April 2016.

### **Comments or queries**

If you have any questions or concerns about the information provided, ACC will be happy to work with you to resolve these. Please address any concerns by emailing [GES@acc.co.nz](mailto:GES@acc.co.nz) or in writing to *Government Engagement and Support, PO Box 242, Wellington 6140*.

If you're unhappy with ACC's response, you may make a complaint to the Office of the Ombudsman. You can call them on 0800 802 602 between 9am and 5pm on weekdays, or write to *The Office of the Ombudsman, PO Box 10152, Wellington 6143*.

Yours sincerely

**Government Engagement and Support**



# ACC Privacy Strategy

*June 2013*



# 1 What is personal information and why is it important to ACC?

---

Personal information is information about identifiable natural persons. It does not include company or organisational information.

Information management is critical to the way ACC conducts its business because we are an information intensive organisation. Each day, we receive 24,000 telephone calls and post 24,000 letters to customers. We receive just over 80,000 emails from external sources daily and send out about 40,000.

ACC's customers include clients, levy payers, providers, employers and staff in New Zealand and overseas. We therefore hold a wide range of personal information including names, birthdates, addresses, medical histories, financial data and employment details.

This strategy sets out ACC's path to becoming a recognised leader in the management of personal information.

## 2 ACC's Privacy Strategy

---

### *Privacy Vision*

Personal information in our care will be managed as carefully and respectfully as if it were our own.

### *Principles*

- Personal information is owned by the customer and we will be proactive in our role as custodians of that information on the customer's behalf.
- In order to build lasting trust-based customer relationships, we will give deep attention to the processes and practices with which we manage a customer's information, including putting the customer at the centre of those practices.
- We will do everything necessary to ensure the integrity, reliability, security and accuracy of all the personal information that we manage on our customers' behalf.
- We will engineer privacy directly into the design of how we do business.
- ACC will benchmark ourselves against recognised best operators in the field of managing personal information.

### *Accountabilities*

Everyone at ACC is responsible for the management of personal information:

- Board:** Responsible for ensuring the organisation is aware of the need to look after our customers' information through high-quality monitoring and information management practices.
- Senior Executive:** Model best privacy practices and ensure privacy is core to all aspects of ACC's culture.
- Managers:** Deliver good privacy results by demonstrating excellence in privacy, complying with legislative requirements, ensuring privacy breaches and near misses are accurately recorded, reported and investigated, identifying privacy risks, ensuring appropriate training for new employees and recognising innovation in privacy by employees.
- Staff:** maintain best practice privacy behaviours, promote privacy at work, actively participate in privacy training, report all privacy breaches and near misses to managers, and identify privacy risks.

## ***Privacy Strategic Intent***

Our privacy strategic intent aligns with and is consistent with the information management lifecycle and the Information Privacy Principles as set out in the Privacy Act 1993. We recognise that it may not be possible to apply these principles in every situation, and in those situations, our actions will be governed by the Privacy Act 1993 and Health Information Privacy Code 1994. ACC's commitments around privacy will extend to those organisations we contract with, who are entrusted to manage and process our customers' personal information on our behalf.

### **a. Creation and collection of personal information:**

- ACC commits to collecting information only for the purposes linked to our organisational functions.
- ACC commits to making people aware of the collection of information, our purposes for doing so, and their rights to access and correct that information.

### **b. Storing, accessing and availability of personal information:**

- ACC commits to maintaining all reasonable safeguards against the loss, misuse or inappropriate disclosure of personal information, and maintaining processes to prevent unauthorised use or access to that information.
- ACC commits to providing individuals with access to their personal information, where appropriate, and respects the individual's right to seek amendment of factually incorrect information.

### **c. Use of and maintenance of personal information**

- ACC commits to only using or disclosing personal information for the purposes for which it is collected, taking reasonable steps to ensure it is complete, relevant, and up to date, and will engage the customer who owns that information in ensuring the quality of that information.
- ACC will not use or disclose information for a purpose that is inconsistent with the original purpose of collection, unless legislatively able to do so or we have consent.

### **d. Archiving and destruction of personal information**

- ACC will maintain and implement retention and disposal policies for personal information as agreed with New Zealand's Chief Archivist and make these policies available to the public.

## **3 ACC's Privacy Roadmap**

---

The privacy strategic roadmap summarises ACC's privacy-related goals for the next three years to June 2016.

The roadmap references the Personal Information Management Index (PIMI), developed in August 2012, as a starting point. The PIMI comprises of three parts and allows for a maximum possible score of 120 points:

- Part 1 (50 points) assesses the quarterly average number of breaches over a denominator of the average number of entitlement claims in a quarter.
- Part 2 (22 points) assesses the organisation's maturity of Governance (i.e. operating procedure) and Staff Capability. This includes organisational management of personal information, progress on implementing the recommendations of the Independent Review, and a measurement of staff that participate in annual privacy training.
- Part 3 (48 points) groups the 12 Information Privacy Principles against an information lifecycle and is designed to assess ACC's maturity and capability against a five point scale in the application of each of the principles to our operations.

ACC aims to increase the total PIMI score by reducing our breaches, improving our Governance and Staff Capability, and aligning with best practice implementation of the information lifecycle.

**Table 1: Privacy Strategy Roadmap 2013-2016**

	June 2013	June 2014	June 2015	June 2016
ACC's privacy operating procedure and staff capability	Privacy operating procedure is centrally located and having an impact on the achievement of overall performance against the privacy strategy, however maturity is still forming (Level 3). 100% of staff complete the annual privacy refresher module	Procedures are operating effectively (Level 4). Privacy improvements and issues are mostly being identified and resolved by frontline staff. 100% of staff complete the annual privacy refresher module	Procedures are operating effectively. All privacy improvements and issues are being identified and resolved. 100% of staff complete the annual privacy refresher module	Operating procedures are in place at all levels, and best practice in operation, is effective, efficient and responsive. 100% of staff complete the annual privacy refresher module
Independent Review recommendations complete	50% complete	80% complete	95% complete	100% complete
Personal information management maturity	All Information Privacy Principles (IPPs) maturity levels are assessed as "Defined" (Level 3). This rating means that relevant policies and procedures are defined and exist, but in some cases there is sporadic application across ACC.	The organisation will increase maturity in the IPPs relating to storage/security (IPP 5) and the disclosure of personal information (IPP 11) to the "Operating and Managed" level (Level 4). This score means policies and procedures in those domains are operating, managed and consistently enforced.	The organisation will increase maturity in all the IPPs to a score of at least Level 4, meaning all domains have policies and procedures that are operating, managed and consistently enforced. Incidents may still occur, but very rarely.	Maintain all areas at a score of 4, with scores of 5 in key principles (including IPPs 5 and 11). A score of 5 means that policies and procedures are in place, enforced and replicated across the New Zealand business and government sector as a best practice example. Incidents under these principles do not occur.
Inadvertent disclosure of personal information (privacy breaches)	The number of breaches at or below a quarterly rolling average of 45 per month	The number of breaches at or below a quarterly rolling average of 22 per month	The number of breaches at or below a quarterly rolling average of 12 per month	The number of breaches is maintained below a quarterly rolling average of 12 per month
Personal Information Management Index target score (out of a maximum 120)	80	90	97.5	105

## 4 Privacy management good practice framework

In August 2012 the 'Independent Review of ACC's Privacy Security of Information' established a framework for what ACC needs to do to govern the management of personal information. The ACC Privacy Strategy is aligned with this framework, which is shown in Diagram 1 below.

### Privacy management good practice framework



Diagram 1