

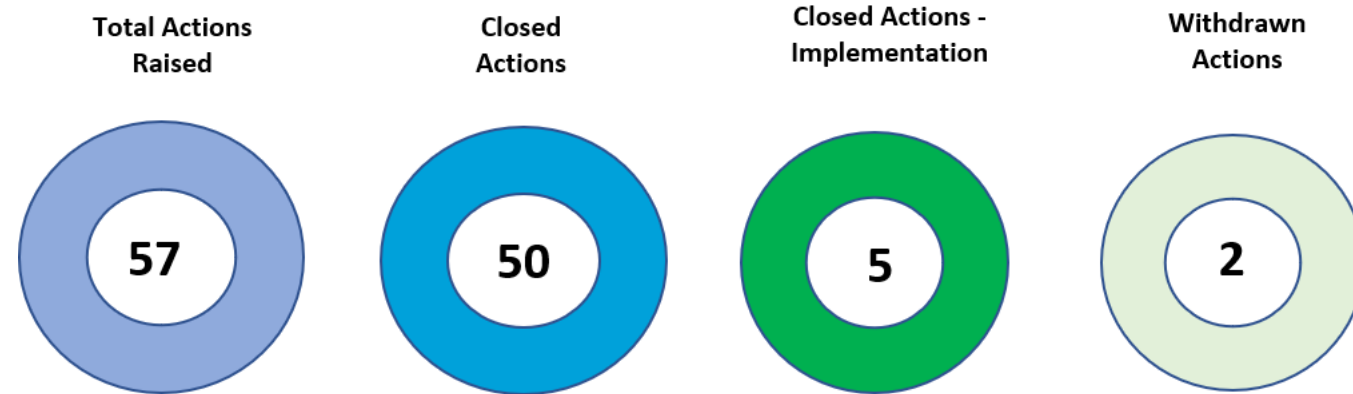
ACC Care of Personal Information Continuous Improvement Programme

Monitoring Dashboard : Key Milestones, Timeframes and Current Status

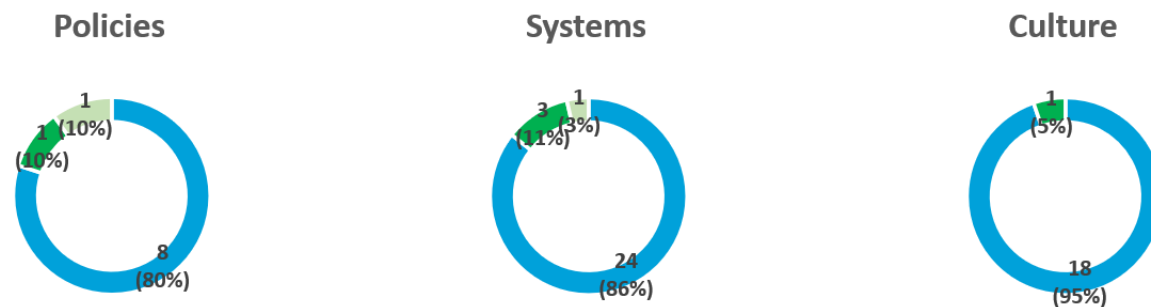
Final Update: July 2023

ACC Care of Personal Information Continuous Improvement Programme | Monitoring Dashboard

This dashboard tracks ACC's progress toward completing the recommendations from the Management of Client Information Independent Review. The numbers and progress tracking is derived from key actions and milestones assigned against each of the 30 recommendations from the Review (refer pages 5 to 9).



Action status by Recommendation Area






Key

- Completed - Closed ✔
- Completed - Implementation Phase ●
- Withdrawn ●








ACC Care of Personal Information Continuous Improvement Programme | Monitoring Dashboard

This tables below depict the current status of ACC's progress toward completing the recommendations from the Management of Client Information Independent Review. Progress tracking is derived from key milestones and timeframes (pages 5 to 9).








Key

- Completed - Closed 
- Completed – Implementation Phase 
- Withdrawn 












Policies

#	Recommendation	Progress
5.1	Consider a reformulation of assurance model for the Privacy Policy to improve accountability at an Executive level.	
5.2	Allocate responsibility for the application, enforcement, and management of the Privacy Policy to a member of the Executive team.	
5.3	Review and update the Privacy Policy to reflect and incorporate changes to legislation, best practice, ACC's organisational structure, client information management expectations and review processes.	
5.4	Review and update the Code of Conduct to reflect and incorporate changes to legislation, best practice, client information management expectations and review processes.	
5.5 5.6	Review and amend the Integrity Policy with a view to ensuring it defines misuse of information and what staff should do if identify an integrity incident. Consider how the Integrity Policy can be strengthened.	
5.7	Assess the impact on staff of working from home, particularly for frontline staff, and consider what additional measures can be put in place to ensure staff have a safe and secure way to stay connected, including the opportunity to debrief safely.	
5.8	Introduce a working from home policy that includes expectations on protecting client information, guidance for staff on approved devices and communication channels.	
5.9	Implement a social media policy which includes expectations for staff on the sharing of client information and discoverability under OIA and the Privacy Act.	

Systems

#	Recommendation	Progress
7.1	Undertake a comprehensive client information mapping exercise, for which an Executive team member is responsible, for the purposes of creating a clear, complete, and accurate overview of how client information is managed within ACC (including collection, retention and destruction).	
7.2	With reference to the client information map prepared in accordance with R7.1, ensure that disclosures made to clients about how their information is managed are accurate. Consider introducing a 'customer facing' version of that roadmap.	
7.3	Undertake a comprehensive review of the role mapping exercise dictionary to establish clear guidelines for granting EOS access, conditions for access and circumstances for review/removal of access rights.	
7.4	Develop and implement a comprehensive and regular permissions review processes, for which an Executive team member is responsible, so that ACC can satisfy itself that only those who need to have access to client information actually have access.	
7.5	Investigate the ways graduated access can be implemented in respect of general claims in a way that does not materially jeopardise ACC's ability to efficiently handle claims. Investigate the introduction of a 'confirm access required' function to appear on-screen before the types of tabs and/or files to be gated in this way.	
7.6	Introduce enhanced, and regular monitoring and auditing procedures, including 'spot checks', to test access permissions, and to confirm that staff access to client information and use of client information is compliant with ACC's privacy protection obligations.	
7.7	Appoint a member of the Executive team to be responsible for the development and implementation of the regular, randomised, and proactive checks of access described in R7.6.	
7.8	Implement a clear policy, for which a member of the Executive team is responsible, which establishes the consequences for workers if the above checks reveal inappropriate access to client information.	
7.9	Ensure that the policies and procedures put in place in accordance with R7.6 and R7.8 are well understood across ACC (which may include putting in place appropriate mandates and structures to support the implementation of the policy across the organisation).	
7.10	Prioritise the Improvement Initiative to enhance ACC's digital footprint capability with a view to actually implementing (and then using, in accordance with a well-documented and publicised policy) granular auditing tools as soon as practicable.	

Culture

#	Recommendation	Progress
8.1	ACC conduct a comprehensive review of the various tools, systems, documents and guidance it currently uses to shape its privacy culture to ensure staff are taught key privacy values.	
8.2	Implement changes to the organisational structure, capability, and mandate of the privacy team and privacy officer (including the Privacy Officer role) to ensure it has sufficient influence, oversight and accountability.	
8.3	Consider how to ensure that PETA and PIA assessments are not a 'box ticking' exercise.	
8.4	Assess what changes are required to ensure that PETAs and PIAs are afforded sufficient weight within the organisation.	
8.5	Review the thresholds for when privacy assessments are required.	
8.6	Consider implementing an organisation-wide education programme on the many different way privacy can be breached, and take steps to ensure that this knowledge and understanding becomes as embedded in the organisation's culture.	
8.7	Undertake a comprehensive review of ACC's privacy training, including to address the gaps identified in ACC's induction and ongoing training for staff.	
8.8	Complete a detailed review of ACC's callout culture (in addition to the review of its Integrity Policy recommended in R5.8) to ensure that there is a robust system in place to enable staff to raise concerns anonymously and without fear of retribution.	
8.9	To better ensure that all breaches and near misses are reported, ACC's review of its callout culture should consider what changes can be made to the privacy breach reporting tool to ensure staff are aware of the different types of breaches that can and should be reported (this recommendation is aligned with R5.6).	
8.10	Consider how to shift the focus from claims to clients across corporate documents, training and performance measures, to ensure that the client or customer is always front and centre.	
8.11	Give consideration to how the word 'sensitive' is currently used to denote personal information that requires additional legal protection. In staff induction and training, consider how to provide education on the fact that all personal information, not just 'sensitive' information has and requires legal protection under the Privacy Act and other legislation.	

ACC Care of Personal Information Continuous Improvement Programme | Key Milestones, Timeframes and Status

Policies

	#	Recommendation	Action		Status	Owner	Current Status	Q1 22-23			Q2 22-23			Q3 22-23	
								June	July	August	September	October	November	December	Q3 and beyond
Policies	5.1	Consider a reformulation of assurance model for the Privacy Policy to improve accountability at an Executive level.	5.1.1	Review of five lines of assurance framework to ensure accountabilities and clear and understood.	✓	DCE Corporate and Finance	Complete - the Risk Assurance and Audit Committee endorsed a move back to a 3 Lines of Defence (3LoD) model.					31 Oct 22			
			5.1.2	Embedding of framework changes.	●	DCE Corporate and Finance	Implementation Phase - Implementation plan has been developed.								30 June 23
	5.2	Allocate responsibility for the Privacy Policy to a member of the Executive team.	5.2.1	Allocate responsibility.	✓	Chief Executive	Complete - responsibility allocated to DCE People and Culture.								
	5.3	Review and update the Privacy Policy to include: current legislative requirements, ACC organisational changes, expectations and review timeframes.	5.3.1	Review and update the Privacy Policy. Roll out will be incorporated into the wider enterprise plan for policy rollout - refer 8.1.2.	✓	DCE People and Culture	Complete - updated policy approved. Revised guidelines released for consultation. Rollout and embedding will be incorporated into 8.1.2.		Policy 31 Jul 22		Guidelines finalised 30 Sept 22				
	5.4	Review and update the Code of Conduct to reflect and incorporate changes to legislation, best practice, client information management expectations and review processes.	5.4.1	Immediate review of Code of Conduct.	✓	DCE People and Culture	Complete - updated policy approved. Revised guidelines released for consultation. Rollout and embedding will be incorporated into 8.1.2.		Policy 31 Jul 22		Guidelines finalised 30 Sept 22				
			5.4.2	Broader review of Code of Conduct. Roll out will be incorporated into the wider enterprise plan for policy rollout.	●	DCE People and Culture	Withdrawn - foundational work required to introduce and embed ACCs new strategy (Huakina Te Rā) has been prioritised. The broader review will now commence in early 2024. This will become part of the wider work program and has therefore been closed for the purposes of this action tracker.						Original Completion Date 31 Dec 22	Revised Completion Date 30 Sept 24	
	5.5	Review and amend the Integrity Policy with a view to ensuring it defines misuse of information and what staff should do if identify an integrity incident. Consider how the Integrity Policy can be strengthened.	5.5.1	Review of Integrity Policy. Roll out will be incorporated into the wider enterprise plan for policy rollout - refer 8.1.2.	✓	DCE People and Culture	Complete - updated policy approved. Revised guidelines released for consultation. Rollout and embedding will be incorporated into 8.1.2.		Policy 31 Jul 22		Guidelines finalised 30 Sept 22				
	5.6														
	5.7	Assess the impact on staff of working from home, particularly for frontline staff, and consider what additional measures can be put in place to ensure staff have a safe and secure way to stay connected, including the opportunity to debrief safely.	5.7.1	Review how ACC's flexible working has impacted frontline staff.	✓	DCE People and Culture	Complete - review completed. Risks considered by Hybrid Working Group and resources and guidelines provided on Te Pataka.								
	5.8	Introduce a working from home policy that includes expectations on protecting client information, guidance for staff on approved devices and communication channels.	5.8.1	Develop and approve a hybrid working policy. Roll out will be incorporated into the wider enterprise plan for policy rollout - refer 8.1.2.	✓	DCE People and Culture	Complete - updated policy approved. Revised guidelines released for consultation. Rollout and embedding will be incorporated into 8.1.2.		Policy 31 Jul 22		Guidelines finalised 30 Sept 22				
5.9	Implement a social media policy which includes expectations for staff on the sharing of client information and discoverability under OIA and the Privacy Act.	5.9.1	Review of Social Media Policy. Roll out will be incorporated into the wider enterprise plan for policy rollout - refer 8.1.2.	✓	DCE People and Culture	Complete - updated policy approved. Revised guidelines released for consultation. Rollout and embedding will be incorporated into 8.1.2.		Policy 31 Jul 22		Guidelines finalised 30 Sept 22					

ACC Care of Personal Information Continuous Improvement Programme | Key Milestones, Timeframes and Status

Systems (continued)

#	Recommendation	Action	Status	Owner	Current Status	Q1 22-23			Q2 22-23			Q3 22-23	
						June	July	August	September	October	November	December	Q3 and beyond
Systems	7.5 Investigate the ways graduated access can be implemented in respect of general claims in a way that does not materially jeopardise ACC's ability to efficiently handle claims. Investigate the introduction of a 'confirm access required' function to appear on-screen before the types of tabs and/or files to be gated in this way.	7.5.1 Investigation.	✓	DCE Service Delivery	Complete - Board agreement to proceed with investigation.								
		7.5.2 Plan and prioritisation of user profiles.	✓	DCE Service Delivery	Complete – approved plan.								
		7.5.3 Review and redesign of roles (phased).	✓	DCE Service Delivery	Complete - the two remaining EOS user profiles (Cover Assessor and Specialist Cover Assessor) have now been completed and released.	3 profiles (including Contact Centre)	4 user profiles	8 user profiles	Implement governance changes and update Dictionary				
		7.5.4 Investigate confirm access viability.	●	DCE Service Delivery	Withdrawn – although the ability to present a pop up screen is possible, this will not be implemented. The risk of unauthorised view of documents will be mitigated by the user role profiles, restricted access and spot checks introduced.		31 Jul 22						
		7.5.5 New action: Review and redesign of EOS Corporate user roles (phased).	✓	DCE Service Delivery	Complete - All corporate user profiles have been rolled out..					Planning Phase 31 Oct 23			Delivery Phase 31 May 23
	7.6 Introduce enhanced, and regular monitoring and auditing procedures, including 'spot checks' to test access permissions and compliance.	7.6.1 Initial pilot.	✓	DCE Service Delivery	Complete - Initial pilot completed.								
		7.6.2 Review and redesign pilot based on learnings.	✓	DCE Service Delivery	Complete – extended pilot with initially 2 frontline teams (extended to a further 4).			MVP Pilot 31 Aug 22					
		7.6.3 Implementation.	✓	DCE Service Delivery	Complete - Leaders Showcase sessions were undertaken for the rollout. Documented guidance material and processes are in place.				Extended Pilot 30 Sept 22	All frontline teams 31 Oct 22			
	7.7 Appoint a member of the Executive team to be responsible for R7.6 implementation	7.7.1 Appoint member of Executive team.	✓	Chief Executive	Complete - responsibility allocated to DCE Service Delivery.								
	7.8 Implement a clear policy, for which a member of the Executive team is responsible, which establishes the consequences for workers if the above checks reveal inappropriate access to client information.	7.8.1 Code of Conduct and Discipline Policy to be updated to reflect any misuse of access issues detected in results from 7.6 checks.	✓	DCE People and Culture	Complete – revised Code of Conduct includes inappropriate access of client information.				30 Sept 22				
7.9 Ensure that the policies and procedures put in place in accordance with R7.6 and R7.8 are well understood across ACC.	7.9.1 Ensure the policy and procedures that support the implementation of R.7.6 and R.7.8 across the organisation are well understood.	✓	DCE People and Culture	Complete - guidelines have been updated and will be released with the further rollout of the spot checks.				30 Sept 22					
7.10 Prioritise the Improvement Initiative to enhance ACC's digital footprint capability with a view to actually implementing (and then using, in accordance with a well-documented and publicised policy) granular auditing tools as soon as practicable.	7.10.1 Baseline and review of current model.	✓	DCE Service Delivery	Complete - baseline completed and validated.									
	7.10.2 Data requirements for reporting and delivery of tracking capability - EOS.	✓	DCE Service Delivery	Complete - data required identified.		31 Jul 22							
	7.10.3 Data requirements for reporting and delivery of tracking capability - Salesforce.	✓	DCE Service Delivery	Complete - Salesforce digital footprint implemented..							Original Completion Date 31 Dec 22	Revised Completion Date 30 June 23	
	7.10.4 Implement enhanced digital footprint (process and product).	✓	DCE Service Delivery	Complete - Enhanced digital footprint product designed and produced.				30 Sept 22					

ACC Care of Personal Information Continuous Improvement Programme | Key Milestones, Timeframes and Status

Culture

							Q1 22-23			Q2 22-23			Q3 22-23	
#	Recommendation	Action	Status	Owner	Current Status	June	July	August	September	October	November	December	Q3 and beyond	
Culture	8.1	Conduct comprehensive review of privacy tools, systems, documents and guidance.	8.1.1	Review the privacy toolkit and supporting systems.	✓	DCE Corporate and Finance	Complete - updates to the team site and privacy hub have been completed. This will continue to be updated as required for new material.		Review of Privacy Resources 31 July 22				Establish Centralised Toolkit 31 Mar 23	
			8.1.2	Develop and approve the enterprise plan for change roll out and behavioural change supports.	●	DCE People and Culture	Implementation phase - plan has been developed detailing change requirements and indicative timeframes for completion. Implementation will be incorporated and monitored via the Privacy programme of work.						30 Apr 23	
	8.2	Implement changes to the organisational structure, capability, and mandate of the privacy team and privacy officer (including the Privacy Officer role) to ensure it has sufficient influence, oversight and accountability.	8.2.1	Design and implement interim arrangements.	✓	DCE Corporate and Finance	Complete – review of initial proposed structure undertaken.							
			8.2.2	Long-term design and implementation.	✓	DCE Corporate and Finance	Complete - roles approved and recruitment underway.					30 Nov 22		
	8.3	Consider how to ensure that PETA and PIA assessments are not a 'box ticking' exercise.	8.3.1	Review of PIA/PETA approval process.	✓	DCE Corporate and Finance	Complete - Review complete. Sign off by Head of Privacy now in place for all PIAs / PETAs as an interim measure.							
			8.3.2	Develop and embed enhanced PIA/PETA framework (including 8.4 and 8.5).	✓	DCE Corporate and Finance	Complete - Review completed and PETA process replaced with a Privacy Risk Assessment. This includes automated approvals, a peer review process aligned to risk, increased engagement with the business and improved risk identification and monitoring.			Review of PETA/PIA Elements 31 Aug 22				Develop resources and incorporate into Centralised Toolkit 31 Mar 23
	8.4	Assess what changes are required to ensure that PETAs and PIAs are afforded sufficient weight within the organisation.	8.4.1	Complete critical assessment of PIA/PETA elements.	✓	DCE Corporate and Finance								
			8.4.2	Develop and embed a positive behaviour towards PIAs/PETAs.	✓	DCE Corporate and Finance								
8.5	Review the thresholds for when privacy assessments are required.	8.5.1	Complete critical assessment of PIA/PETA process - threshold requirements.	✓	DCE Corporate and Finance									
8.6	Consider implementing an organisation-wide education programme on the many different way privacy can be breached, and take steps to ensure that this knowledge and understanding becomes as embedded in the organisation's culture.	8.6.1	This will be addressed as part of actions for recommendation 8.7.	✓	DCE People and Culture	Complete: learning approach, artefacts required, next steps and implementation timelines have been endorsed by key stakeholders. Material continues to be developed as per the learning approach document.					30 Nov 22			

ACC Care of Personal Information Continuous Improvement Programme | Milestones, Timeframes and Status

Culture (continued)

	#	Recommendation	Action	Status	Owner	Current Status	Q1 22-23			Q2 22-23		Q3 22-23			
							June	July	August	September	October	November	December	Q3 and beyond	
Culture	8.7	Undertake a comprehensive review of ACC's privacy training, including to address the gaps identified in ACC's induction and ongoing training for staff.	8.7.1	Review current material and identify what is required based on new and updated policies and report recommendations.	✓	DCE People and Culture	Complete - current state material has been reviewed.				30 Sept 22				
			8.7.2	Develop refreshed learning interventions (dependency on 5.3 - 5.9).	✓	DCE People and Culture	Complete : learning approach, artefacts required, next steps and implementation timelines have been endorsed by key stakeholders.					30 Nov 22			
			8.7.3	Implementation plan in place and new and updated material being rolled-out.	✓	DCE People and Culture	Complete : learning approach, artefacts required, next steps and implementation timelines have been endorsed by key stakeholders. The learning approach will form a part of the wider change programme (8.1.2).					30 Nov 22			
	8.8	Complete a detailed review of ACC's callout culture (in addition to the review of its Integrity Policy recommended in R5.8) to ensure that there is a robust system in place to enable staff to raise concerns anonymously.	8.8.1	Complete review (dependency on 5.3 - 5.9).	✓	DCE People and Culture	Complete - Updated policy approved. Revised guidelines released for consultation. Rollout and embedding will be incorporated into 8.1.2.		Policy 31 Jul 22		Guidelines finalised 30 Sept 22				
	8.9	As part of R8.8, consider what changes can be made to the privacy breach reporting tool.	8.9.1	Detailed assessment of the online reporting tool.	✓	DCE Corporate and Finance	Complete - the Privacy Breach Reporting tool used by the Privacy team has been updated to better facilitate the follow up and reporting on the types of identified breaches. dashboard reporting to follow. The front end user form has not been affected.				30 Sept 22				
			8.9.2	Develop and implement changes to the online reporting tool.	✓	DCE Corporate and Finance	Complete - guidance updated to reflect definitions of breach types and incorporated into the privacy hub. Implementation timeframe for updated data fields to reflect the organisational structure has been scheduled.							30 Apr 23	
	8.10	Consider how to shift the focus from claims to clients across corporate documents, training and performance measures, to ensure that the client or customer is always front and centre.	8.10.1	Develop key themes/messages and incorporate into broader strategic direction refresh, including values.	✓	DCE Strategy, Engagement and Planning.	Complete - the revised ACC Strategy will include an explicit shift from an injury centric claims focus to client wellbeing. Work will be undertaken with People & Culture to embed the behaviours required by the revised strategy.							31 Dec 22	
	8.11	Give consideration to how the word 'sensitive' is currently used to denote personal information that requires additional legal protection. In staff induction and training, consider how to provide education on the fact that all personal information, not just 'sensitive' information has and requires legal protection under the Privacy Act and other legislation.	8.11.1	Develop sensitive narrative and key messages.	✓	DCE Corporate and Finance	Complete - recommended definition of "sensitive" and "private" information provided. This will be incorporated into relevant ACC process and training material.		Original Completion Date 31 Jul 22	Revised Completion Date 31 Aug 22					
			8.11.2	Incorporate definitions into material.	✓	DCE Enterprise Change Delivery	Complete - required amendments have identified and made. Embedding will be part of action 8.1.2.							31 Dec 22	