

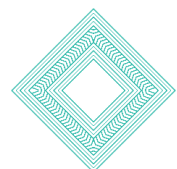
Variation to Compliance Notice

Issued under section 127 of the Privacy Act 2020

Agency	Oranga Tamariki - Ministry for Children
Original notice number	CN 01/2025a
Variation notice number	CN 01/2025b
Means of service	Email

1 Background to Variation

- 1.1. Compliance notice CN 01/2025a was issued to Oranga Tamariki on 26 May 2025 (**the Notice**) under section 124 of the Privacy Act 2020 (**the Act**) for breaches of the Act identified in the Notice.
- 1.2. Oranga Tamariki has provided reports to the Privacy Commissioner on its progress towards meeting the requirements of the Notice on 3 October 2025, 19 November 2025, 16 January 2026 and 22 April 2026, which confirmed that actions 22 i(a)(1)-(4), ii(a)(1)-(3), ii(b)(1)-(3), iii(a)(1)(2), iii(b)1, iv(a)(1)-(4) have been completed.
- 1.3. Two remaining actions are now overdue for completion:
 - iv(a)(5) (Develop and deliver a privacy performance reporting framework that includes “implementation of controls and recommendations identified in Privacy Impact Assessments”) due 31 October 2025, and
 - iv(a)(6) (Develop and deliver a privacy performance reporting framework that includes the “effectiveness of the information access control settings”) due 30 March 2026.
- 1.4. Oranga Tamariki completed a business case to secure funding for its privacy assurance function action required to satisfy action iv(a)(5). A new Governance, Risk and Compliance tool will be implemented to support the assurance function’s monitoring and reporting of Privacy Impact Assessments. Oranga Tamariki has requested an extension of time to this action in order complete the full implementation of the tool and establishment of the assurance function.



- 1.5. Oranga Tamariki has also requested an extension of time to satisfy action iv(a)(6) to enable the full implementation of a Privacy Assurance Tool. Oranga Tamariki says the tool will enable a more robust verification mechanism of the existing access controls on the CYRAS system, leveraging system audit logs, established audit processes, and access transparency. The tool has already been developed and is currently being tested, with full implementation planned by the end of June 2026.
- 1.6. Having considered this request for variation of the notice and the progress made by Oranga Tamariki under the Notice, the Privacy Commissioner has agreed to vary the Notice as set out below.

2 Compliance notice varied

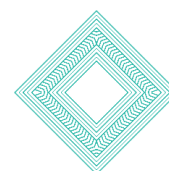
- 2.1. The timeframes for the following actions required by Oranga Tamariki in the Notice as set out in paragraph 23 of the Notice are varied:

iv. Strengthen accountability and reporting of privacy incidents. Oranga Tamariki must:		
a. Develop and deliver a privacy performance reporting framework that includes		
5.	implementation of controls and recommendations identified in Privacy Impact Assessments	Due 31 January 2027 (varied from 31 October 2025)
6.	the effectiveness of the information access control settings	Due 31 July 2026 (varied from 30 March 2026)

- 2.2. In respect of the remaining actions 22 iv(a)(5) and (6), paragraph 24 of the Notice is replaced with the following:

For each of the remaining actions 22 iv(a)(5) and (6), Oranga Tamariki must:

- a. provide a report to my Office by the due date specified in paragraph 2.1 setting out how it has met the requirement of that action, and



- b. provide any further information in relation to these reports that is reasonably required by my Office to ensure and verify that an action has been completed.

3 Right to appeal

- 3.1. Oranga Tamariki has the right to appeal the decision to vary the Notice to the Human Rights Review Tribunal (**the Tribunal**) under section 131 of the Act. An appeal must be lodged in the Tribunal within 15 working days from the date of the issue of this notice.
- 3.2. The Tribunal may allow an appeal for one of the reasons listed at section 131(3) of the Act.



Michael Webster

Privacy Commissioner

Dated: 26 June 2026

