

# Misuse of 2023 Census Data Remediation Programme

## Action Plan





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## Document purpose

The purpose of this action plan is to outline the structured approach and specific activities required to address the recommendations from the Independent Investigation and Assurance Review of Allegations of Misuse of 2023 Census Information, commissioned by Stats NZ, and the findings from the Public Service Commission (PSC) Inquiry into the Protection of Personal Information, regarding the misuse of 2023 Census data.

This plan serves as a roadmap for implementing improvements within Stats NZ across key operational areas, including governance, privacy, risk management, contract oversight, and complaint handling.

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# Introduction

The Misuse of 2023 Census Data Remediation Programme was established in response to concerns raised about the handling and potential misuse of personal information collected during the 2023 Census. Allegations included inappropriate retention, use, and sharing of sensitive data by third-party service providers, particularly during electoral activities.

The programme aims to address the findings of the Stats NZ commissioned Independent Investigation and Assurance Review of Allegations of Misuse of 2023 Census Information (the Review) led by Doug Craig and the Public Service Commission (PSC) Inquiry into the Protection of Personal Information (the PSC Inquiry). Its primary goal is to restore public trust in Stats NZ's ability to securely manage sensitive data and uphold legal and ethical standards.

## Stats NZ's purpose and priorities

Stats NZ Tatauranga Aotearoa is New Zealand's official data agency.

We collect information from people and organisations through censuses and surveys. We use this information to publish insights and data about New Zealand, and support others to use the data.

Our purpose, *About Aotearoa, for Aotearoa – Data that improves lives today and for generations to come* talks to our role as leading the way for New Zealand's changing data future, reflects our commitment to ensuring New Zealanders have quality data and statistics and speaks to the reason we exist, to serve the interests of the public good.

Our strategic priorities are our 'what': everything we do is focused on supporting these and bringing them to life:

- Proactively improve the health of the data system of Aotearoa.
- Measure what matters and proactively manage risk around core systems.
- Deliver for and with Māori, iwi and hapū.
- Become an organisation that uses administrative data first.

## Programme background and context

Everyone in Aotearoa New Zealand on census day is required by law to complete the census, but the law alone does not make that happen. There is a significant and purposeful campaign that goes into encouraging participation.

The 2018 Census collection response rates generally, and for Māori and Pacific peoples in particular, were unacceptably low. Stats NZ made a commitment to do everything possible to ensure that the response rates were higher for the 2023 Census. This included a commitment to working more closely with Iwi Māori and Pacific communities to improve response rates.

For the 2023 Census Stats NZ was aiming for a national response rate of more than 90 percent for both the general population and for people of Māori descent. The mission for the 2023 Census was to rebuild trust and confidence in census and deliver quality data for customers. To achieve this Stats NZ identified four strategic initiatives for 2023 Census:

- Drive high response rates, including making participation easy.
- Deliver quality data to meet customer needs.

- Build trust to gain commitment, including proactively engaging with Treaty partners, stakeholders and communities.
- Build trust and value for Māori through data equity, including collaborating with and building capacity and capability for iwi Māori.

In late March 2023 Stats NZ identified low response rates for people identifying as Māori, particularly in South Auckland and embarked on an effort to increase those rates. As part of this Stats NZ engaged Whānau Ora Commissioning Agency to lift response rates for Māori in South Auckland.

The collection operations were led by Whānau Ora's Te Pae Herenga o Tāmaki collective. Manurewa Marae is a part of the collective and a sub-provider under Stats NZ's contract with Whānau Ora Commissioning Agency.

## Allegations of misuse of census forms and data

On 29 May 2024 a journalist alerted Stats NZ to serious allegations relating to the inappropriate use of census data collected at Manurewa Marae. The email claimed that personal information collected for the 2023 Census was used for an improper purpose by a third-party service provider, and that Stats NZ had been made aware of the allegations previously and did not take appropriate action.

The Government Statistician and Stats NZ Chief Executive immediately commissioned an independent investigation into the allegations, to be led by Doug Craig of RDC Group.

On 10 June 2024 the Prime Minister directed the Public Service Commission (PSC) to conduct its own, broader inquiry into how government agencies protected personal information provided for the 2023 Census and Covid-19 vaccination purposes, led by Michael Heron KC and Pania Gray.

Nationally 4.5 million census forms were collected. Of that, the Whānau Ora Commissioning Agency contract resulted in an additional 40,000 census responses. The findings relate to the forms from around 1800 households visited by Manurewa Marae staff.

## Action plan goals and objectives

The Misuse of 2023 Census Data Remediation Programme aims to rebuild public trust in Stats NZ by addressing the findings of the Doug Craig Review and the Public Service Commission (PSC) Inquiry.

The programme focuses on ensuring compliance with the Privacy Act 2020 and Data and Statistics Act 2022, strengthening governance frameworks, and enhancing privacy and risk management capabilities to safeguard sensitive information. By embedding systemic improvements into core operations, the programme seeks to resolve gaps identified in the reviews, including issues with data governance, contract oversight, and complaint handling processes.

### Objectives

The programme objectives are defined by integrating the findings and recommendations from the Doug Craig Review and the Public Service Commission Inquiry, to address key areas of governance, privacy, contract management, and complaint handling.

The programme will:

- Implement the findings and recommendations of the reviews by 30 June 2025.
- Provide consistent visibility of the progress against each action plan area.
- Demonstrate clear mapping between the actions completed and the recommendations of the reviews.
- Provide transparency and robust communication channels between Stats NZ and key stakeholders, including the Minister of Statistics and Public Service Commission.
- Start to rebuild trust and confidence in Stats NZ.

The objectives prioritise compliance with the Privacy Act 2020 and Data and Statistics Act 2022, alongside commitments to Te Tiriti o Waitangi obligations. By focusing on immediate risks and quick wins in phases one and two and embedding sustainable practices in phase three, the objectives align with programme management best practices, emphasising planning, risk management, accountability, and public trust restoration.

## Actions

The findings and recommendations of the reviews have been themed into eight areas:

### 1. **Strengthen data governance and security**

Ensure all sensitive data, including personal information, is managed, shared, and disposed of in compliance with the Privacy Act 2020 and the Data and Statistics Act 2022.

- **Action ID PC-02:** Review certificates of confidentiality practices to ensure robust compliance with the Data and Statistics Act 2022.  
Deadline: 31 March 2025
- **Action ID PC-03:** Conduct an internal audit of Privacy Impact Assessments to confirm effective controls.  
Deadline: 31 December 2024 - completed, report due April 2025
- **Action ID PC-07:** Seek assurance on the secure disposal of personal information as per the contract with Whānau Ora Commissioning Agency.  
Deadline: 17 January 2025 - completed
- **Action ID FO-07:** Implement best practice cross agency data sharing practices using the data sharing standards-based framework being developed by PSC.  
Deadline: 30 June 2025

### 2. **Enhance governance frameworks**

Build robust governance structures and oversight mechanisms to ensure transparent decision-making and accountability across all programme activities.

- **Action ID FO-04:** Commission an external expert to review Stats NZ's governance structures to determine future needs.  
Deadline: 31 January 2025 - completed
- **Action ID FO-05:** Expand the Risk and Assurance Committee to ensure robust governance and oversight.  
Deadline: 31 January 2025 - completed
- **Action ID FO-06:** Determine whether attributing prima facie individual responsibility is legally and practically possible and identify appropriate action.  
Deadline: 31 January 2025 - completed

### 3. **Improve privacy and risk management capabilities**

Enhance advanced privacy frameworks, risk management systems, and training programs to mitigate risks and strengthen the organisation's ability to handle sensitive data securely.

- **Action ID PC-01:** Strengthen technical privacy, legal, and risk functions through a restructure of the Office of the Chief Executive.  
Deadline: 31 December 2024 - completed
- **Action ID PC-04:** Establish a new Principal Privacy Advisor role to strengthen privacy practices.  
Deadline: 31 December 2024 - completed, to be recruited
- **Action ID PC-05:** Build and implement a privacy awareness, education, and training programme.  
Deadline: 30 June 2025
- **Action ID PC-06:** Establish a new Principal Risk and Assurance Advisor role for risk management.  
Deadline: 31 December 2024 – completed, to be recruited

### 4. **Address conflict-of-interest issues**

Reinforce policies to identify, manage, and document conflicts of interest across all operational areas, ensuring transparency and public trust.

- **Action ID COF-01:** Update the conflict-of-interest policy to ensure robustness in stakeholder engagement and contract management.  
Deadline: 31 March 2025
- **Action ID COF-02:** Strengthen conflict-of-interest procedures, including the requirement for all staff to make regular declarations.  
Deadline: 31 March 2025
- **Action ID COF-03:** Develop a training and communications programme on conflict-of-interest policies.  
Deadline: 31 March 2025
- **Action ID COF-04:** Develop a suite of training materials and specialised guidance for staff who work in communities and public-facing partnership roles, including with Stats NZ's Te Tiriti partners.  
Deadline: 30 June 2025
- **Action ID COF-05:** Implement a system to record and manage conflict-of-interest declarations for transparency.  
Deadline: 31 March 2025

### 5. **Refine complaint handling and escalation processes**

Improve the centralised complaint handling systems, enhance escalation pathways, and align processes with Public Service Commission model standards to address complaints efficiently and transparently.

- **Action ID EIH-01:** Review policies for managing and escalating complaints to ensure effective entry-point handling.  
Deadline: 31 March 2025



- **Action ID EIH-02:** Review policies, systems, and processes against the Public Service Commission’s model standards for speaking up about possible wrongdoing and improve them where necessary.  
Deadline: 31 March 2025
- **Action ID EIH-03:** Train staff on “speak up” culture and escalation pathways.  
Deadline: 30 June 2025
- **Action ID EIH-04:** Provide comprehensive issue and risk management training to all relevant staff to enhance risk identification and awareness, particularly related to complaints, and elevate organisational risk maturity.  
Deadline: 30 June 2025
- **Action ID EIH-05:** If contact centre services are outsourced, ensure complaints procedures align with Stats NZ’s policies and maintain a central log of all calls, including complaints and issues raised, to be provided as part of the end-of-contract handover.  
Deadline: 30 June 2025
- **Action ID EIH-06:** Implement a system to record and retain calls to Stats NZ office lines for better complaint management.  
Deadline: 31 March 2025

#### 6. **Ensure effective contract management**

Review and improve procurement and contract management practices, including risk-based monitoring, to ensure third-party compliance and alignment with best practices.

- **Action ID CMM-01:** Review and improve procurement and contract management practices to ensure robustness.  
Deadline: 30 June 2025
- **Action ID CMM-02:** Seek advice and guidance from MBIE and the Public Service Commission to develop internal guidance on identifying and managing conflicts of interest in partner and supplier organisations.  
Deadline: 30 April 2025
- **Action ID CMM-03:** Embed robust conflict-of-interest practices into contract management policies and procedures. This includes requiring internal and external declarations of interest.  
Deadline: 30 June 2025
- **Action ID CMM-04:** Implement a risk assessment, monitoring, and audit programme for contracts.  
Deadline: 30 April 2025
- **Action ID CMM-05:** Review the structure, mandate, and business interfaces of the Commercial Arrangements team to ensure it is appropriately resourced to implement and maintain contract management improvements.  
Deadline: 31 March 2025

#### 7. **Restore public trust and confidence**

Rebuild public confidence in Stats NZ’s processes by ensuring transparency, accountability, and alignment with oversight body expectations.

- **Action ID PC-08:** Refer Doug Craig’s final report to the Privacy Commissioner and NZ Police, and collaborate on findings.  
Deadline: 31 January 2025 - completed

## 8. Embed future operations

Integrate robust policies, systems, and structures into future census operations to avoid duplication, ensure sustainability, and meet legal and ethical obligations, including Te Tiriti o Waitangi commitments.

- **Action ID FO-01:** Integrate future census operations into Stats NZ's established systems and structures.  
Deadline: 31 December 2024 - completed
- **Action ID FO-02:** Embed proactive iwi engagement into future census planning to meet Te Tiriti obligations.  
Deadline: 31 December 2024 - completed
- **Action ID FO-03:** Include privacy and legal corporate functions in the census programme, with clear mandates.  
Deadline: 31 December 2024 - completed
- **Action ID FO-08:** Undertake a review of criteria and use of incentives and infringements.  
Deadline: 30 June 2025
- **Action ID FO-09:** Establish process to ensure future collection methods are not linked with electoral processes.  
Deadline: 30 June 2025

## Action plan phases

Action items within the Misuse of 2023 Census Data Remediation Programme are prioritised based on their urgency, impact, and alignment with the programme's objectives. This prioritisation ensures that high-risk areas and critical compliance requirements are addressed promptly, while building a foundation for sustainable improvements.

**Phase 1 (completed by 31 January 2025):** Addressed critical risks and foundational tasks. Key achievements included strengthening privacy and risk management capabilities, embedding established policies and systems into future census operations, ensuring proactive iwi engagement, strengthening governance through an external review and Risk and Assurance Committee expansion. These actions established the foundation for compliance, risk mitigation, and operational readiness.

**Phase 2 (to be completed by 31 March 2025):** Focuses on refining processes, addressing medium-term objectives, and delivering programme-specific deliverables. This includes improving complaint handling systems and strengthening escalation pathways and implementing monitoring frameworks for contract management. Additionally, programme-specific deliverables such as a comprehensive programme plan, risk management framework, stakeholder engagement plan, and reporting mechanisms will be finalised to ensure structured coordination and accountability.

**Phase 3 (to be completed by 30 June 2025):** Actions in Phase 3 aim to build on Phase 1 and 2 progress by embedding sustainable practices and addressing longer-term objectives. This includes the rollout of training programmes, implementing monitoring and assurance frameworks, and refining operational systems to ensure ongoing compliance and accountability.

Prioritisation within each phase considers dependencies between actions, with high-impact foundational tasks completed first to enable the successful execution of subsequent steps. This

phased approach ensures the programme delivers immediate results while establishing a resilient and efficient operational framework for the future.

## Programme structure

In addition to the agreed actions, to ensure the successful delivery of the Misuse of 2023 Census Data Remediation Programme, a structured approach is being applied to manage programme-specific deliverables, including the programme plan, risk management framework, stakeholder engagement plan, and quality assurance plan.

## Programme deliverables

1. **Programme Plan:** The programme plan will act as a roadmap, outlining objectives, key milestones, timelines, and responsibilities. It will ensure all action items are aligned with programme objectives and phased appropriately (e.g., Phase 1 for immediate priorities and Phase 2 for long-term improvements). Progress will be tracked using measurable KPIs and monitored through regular reporting to governance bodies, including the Risk and Assurance Committee.
2. **Risk Management Framework:** A robust risk management framework will identify, assess, and mitigate risks across all workstreams. This framework will include processes for risk identification, escalation pathways, and regular reviews to address emerging challenges. The framework will ensure accountability through clearly defined roles for risk owners and regular reporting of risk status to governance bodies and stakeholders.
3. **Stakeholder Engagement Plan:** The stakeholder engagement plan will map out key stakeholders, their roles, and the communication strategies required to keep them informed and engaged. This plan will focus on transparency and collaboration, with tailored engagement strategies for iwi partners, government oversight bodies, and the public. It will include regular updates, consultation opportunities, and mechanisms for feedback to address stakeholder needs effectively.
4. **Quality Assurance Plan:** The quality assurance plan will define standards and processes to ensure that programme deliverables meet their intended objectives and comply with regulatory and organisational requirements. This will include regular audits, milestone reviews, and independent assessments to verify the quality and effectiveness of actions. Metrics for success will be clearly outlined, and findings will be reported to the Risk and Assurance Committee to maintain transparency and accountability.

## Programme framework

The programme framework is built on best practices in project and programme management, ensuring that all activities are well-coordinated and systematically executed. Programme planning establishes clear objectives, deliverables, and timelines, while risk and issue management ensures potential challenges are identified and mitigated promptly. Resource management allocates appropriate personnel and budget to critical tasks, ensuring efficient use of resources.

Scope management prevents scope creep by defining boundaries for deliverables and aligning them with programme objectives. Finally, comprehensive reporting provides regular updates on progress, risks, and performance to maintain transparency and drive decision-making. Together,

these frameworks and governance mechanisms create a structured, accountable, and efficient approach to achieving the programme’s goal.

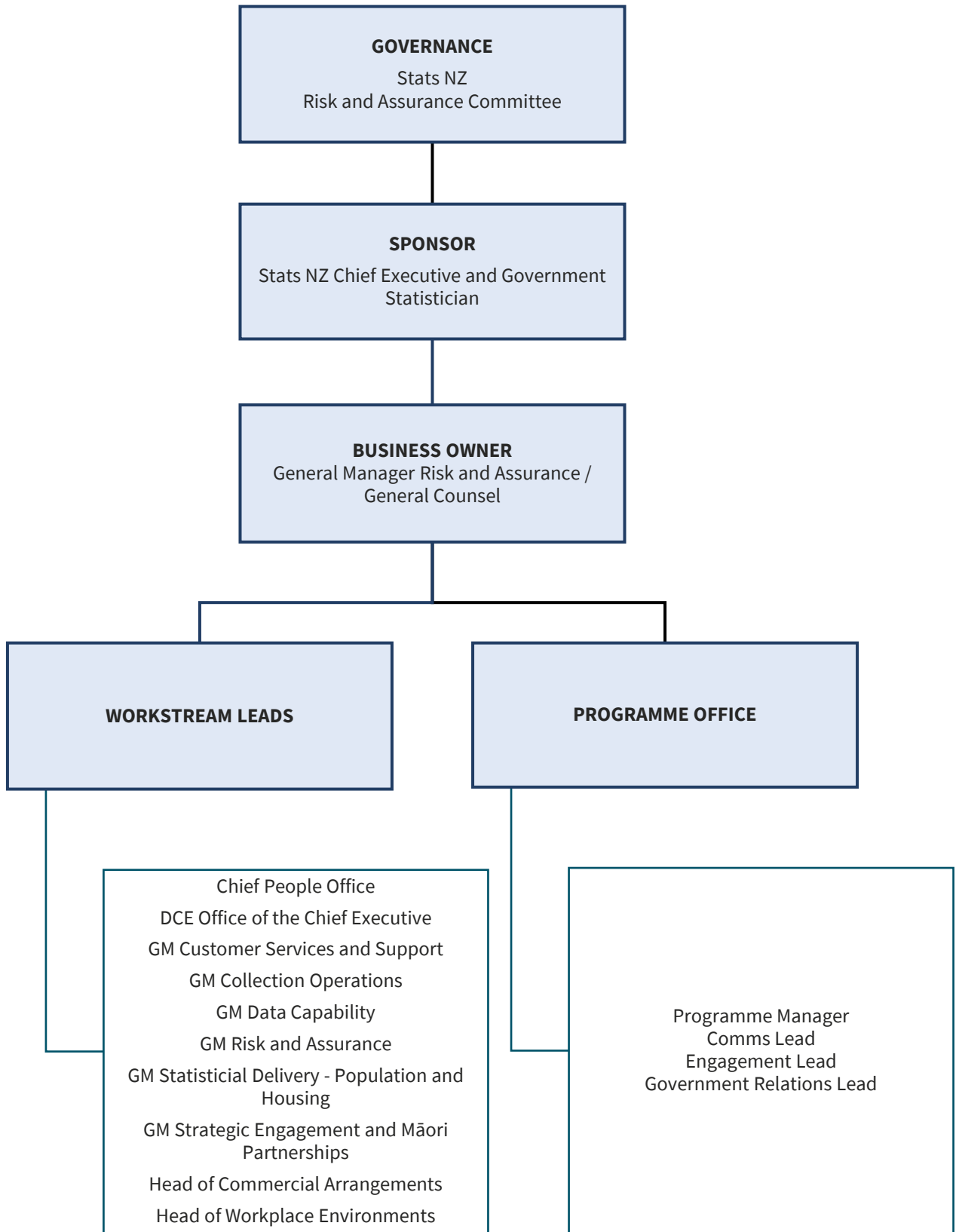
## Roles and responsibilities

Implementation of the action plan will be led by the new General Manager Risk and Assurance and General Counsel, reporting directly to Stats NZ Chief Executive and Government Statistician as the programme sponsor.

Each action has been assigned a tier 2 or 3 workstream lead responsible for the planning and delivery of each action within the agreed timeframe and to a quality standard.

Governance and oversight will be provided by Stats NZ’s Risk and Assurance Committee.

<b>Programme role</b>	<b>Position</b>
Governance	<ul style="list-style-type: none"> <li>Stats NZ Risk and Assurance Committee</li> </ul>
Sponsor	<ul style="list-style-type: none"> <li>Stats NZ Chief Executive and Government Statistician</li> </ul>
Business owner	<ul style="list-style-type: none"> <li>General Manager Risk and Assurance and General Counsel</li> </ul>
Workstream leads	<ul style="list-style-type: none"> <li>Chief People Office</li> <li>DCE Office of the Chief Executive</li> <li>GM Customer Services and Support</li> <li>GM Collection Operations</li> <li>GM Data Capability</li> <li>GM Risk and Assurance and General Counsel</li> <li>GM Statistical Delivery - Population and Housing</li> <li>GM Strategic Engagement and Māori Partnerships</li> <li>Head of Commercial Arrangements</li> <li>Head of Workplace Environments</li> </ul>
Programme Office	<ul style="list-style-type: none"> <li>Programme Manager</li> <li>Communications Lead</li> <li>Engagement Lead</li> <li>Government Relations Lead</li> </ul>



## Reporting

The reporting framework for the Misuse of 2023 Census Data Remediation Programme ensures transparency, accountability, and effective communication of progress to stakeholders. Regular reporting is a critical component of governance and is overseen by the Risk and Assurance Committee, which provides strategic oversight and monitors progress against key milestones and programme deliverables.

Reports will focus on tracking the status of action items across all phases, highlighting completed tasks, ongoing activities, and any delays or risks. Progress updates will be provided to the Minister of Statistics and Public Service Commission on a monthly basis, ensuring alignment with organisational goals and public expectations. These reports will include updates on compliance with legal obligations, risk management, and the achievement of programme-specific deliverables.

Additionally, internal reporting mechanisms will track the performance of workstreams, ensuring coordination across teams and timely identification of issues. Regular dashboards, risk summaries, and quality assurance reports will be shared with Governance and senior leadership to support decision-making.

# Appendix 1: Summary of Stats NZ commissioned Review led by Doug Craig

The final review, provided to Stats NZ in January 2025, investigates allegations of misuse of census information during the 2023 Census and evaluates the role of Whānau Ora Commissioning Agency and Stats NZ in ensuring data integrity, privacy, and operational compliance.

The review investigates:

- whether Whānau Ora Commissioning Agency's handling of census forms and data met legal and contractual obligations
- if front line engagement with people and whānau aligned with Stats NZ's expectations and privacy standards
- the adequacy of data sharing and monitoring mechanisms established by Stats NZ.

The investigation, which took place between June 2024 and January 2025, included a review of documents, including contracts and emails, interviews with Stats NZ staff, Whānau Ora Commissioning Agency representatives, and the whistleblowers, and analysis of relevant incidents and reports.

## **The review made findings in four key areas.**

### 1. Contractual and operational management

- The contract between Stats NZ and Whānau Ora Commissioning Agency signed in April 2023 outlined critical expectations for privacy, training, and operational compliance. However, many contractual obligations, such as completing Privacy Impact Assessments and confidentiality certificates, were not fulfilled.
- Training for Whānau Ora Commissioning Agency staff was inadequate, with no formal workforce training plan completed before census activities began.
- Governance and oversight by Stats NZ were insufficient, with minimal monitoring of Whānau Ora Commissioning Agency's compliance.

### 2. Census collection practices

- Allegations arose in May-June 2023 about improper handling of census forms by Whānau Ora Commissioning Agency's sub-providers, specifically Manurewa Marae. Issues included:
  - photocopying census forms
  - retaining completed forms for extended periods
  - failing to seal and promptly return forms
  - collecting online census completion codes, raising privacy concerns.

### 3. Data sharing

- Address data provided by Stats NZ to Whānau Ora Commissioning Agency in April 2023 was anonymised and did not include personal identifiers, yet Whānau Ora

Commissioning Agency's subsequent matching with its own databases to identify Māori households raised concerns about privacy compliance.

- Stats NZ failed to ensure safeguards, including a comprehensive Privacy Impact Assessment, were implemented before data sharing began.

#### 4. Impact and effectiveness

- Whānau Ora Commissioning Agency's activities contributed to an increase in census responses among Māori populations in Auckland, yet the overall response rate fell short of the aspirational target of 90 percent.
- Despite some success, the engagement model introduced risks due to inadequate planning, monitoring, and adherence to privacy protocols.

### **The review made recommendations for action in nine key areas.**

#### 1. Maintain robust contract management and oversight

- Maintain oversight and assurance activities proportionate to the size, risks, and statutory requirements of contracts.
- Ensure contracts are actively monitored and delivered in compliance with relevant requirements.

#### 2. Proactively meet Te Tiriti obligations

- Develop long-term strategies to fulfil Te Tiriti obligations under the Data and Statistics Act 2022.
- Avoid initiatives developed under time pressure by engaging Māori partners early and collaboratively.

#### 3. Strengthen internal controls and governance

- Ensure internal controls, oversight mechanisms, and programme governance arrangements are robust and prudently operated.
- Governance arrangements must apply regardless of perceived trust in contractors or the level of contract approval.

#### 4. Conduct risk assessments for outsourcing

- Risk assessments for outsourced functions must include potential reputational and operational risks associated with suppliers.

#### 5. Contract oversight arrangements to reflect risk assessments.

- Include corporate expertise in projects
- Ensure relevant corporate functions (e.g., privacy, legal, procurement) are integrated into projects and programmes like the Census.
- Their roles and responsibilities should be clearly defined and formally incorporated into planning and execution.



6. Adhere to good procurement practices

- Future procurement processes should:
  - follow public sector guidelines for contracting
  - be well-documented and include risk management processes.

7. Safeguard sensitive data

- Ensure that sensitive data provided to third parties is:
  - properly safeguarded through mechanisms like Certificates of Confidentiality
  - stored, used, and disposed of in compliance with the Data and Statistics Act 2022
  - verified through assurance mechanisms, including inspections where necessary.

8. Establish a central complaints log

- Implement a centralised system to:
  - log complaints and issues raised about census operations
  - track actions taken in response to these complaints
  - report on these issues routinely to senior management and governance.

9. Refer findings to external agencies

- Refer the findings of the investigation to:
  - The Office of the Privacy Commissioner
  - New Zealand Police.

## Appendix 2: Action Register

RAG	Area	Action ID	Action	Status	Deadline	ELT 1	ELT 2	Workstream Leads
Completed	PRIVACY AND CONFIDENTIALITY	PC-07	Assurance to be sought on status of confidential personal information – formal assurance and compliance with the requirements of contract between Stats NZ and Whānau Ora Commissioning Agency that confidential and personal information has been securely disposed of in a manner that ensures the information can no longer be recovered or reconstructed and is no longer held.	Completed	17-Jan-25	DCE Office of the Chief Executive and Chief of Staff		DCE Office of the Chief Executive and Chief of Staff
Completed	FUTURE OPERATIONS	FO-01	Embed Stats NZ's robust and well-established policies, systems, processes and structures for the next census rather than creating standalone or duplicate census project structures, policies, systems and processes.	Completed	31-Dec-24	Chief Executive and Government Statistician	DCE Insights and Statistics	General Manager – Statistical Delivery, Population and Housing
Completed	FUTURE OPERATIONS	FO-02	Engagement with iwi partners should be embedded into future census so it is planned, proactive, ongoing and timely to ensure Stats NZ's Te Tiriti obligations under the Data and Statistics Act 2022 are met.	Completed	31-Dec-24	Chief Executive and Government Statistician	DCE Strategic Engagement, Māori Partnerships and Data Capability, DCE Insights and Statistics	General Manager – Statistical Delivery, Population and Housing, General Manager, Strategic Engagement, Māori Partnerships & Outcomes
Completed	FUTURE OPERATIONS	FO-03	Ensure that corporate units with capability relevant to census, including privacy and legal, are part of the census programme and that the responsibilities of those corporate functions are clear, understood and mandated.	Completed	31-Dec-24	Chief Executive and Government Statistician	DCE Insights and Statistics	General Manager – Statistical Delivery, Population and Housing
Completed	FUTURE OPERATIONS	FO-04	Commission an external expert to review Stats NZ's current governance structure, including boards, committees, and executive leadership. It will determine future needs to ensure robust and fit for purpose governance.	Completed	31-Jan-25	Chief Executive and Government Statistician		Chief Executive and Government Statistician
Completed	FUTURE OPERATIONS	FO-05	Expand the Risk and Assurance Committee to add additional expertise to ensure robust governance and oversight of Stats NZ response to investigation findings.	Completed	31-Jan-25	Chief Executive and Government Statistician		Chief Executive and Government Statistician
Completed	PRIVACY AND CONFIDENTIALITY	PC-01	Strengthen the specialist technical privacy, legal and risk functions and maturity within Stats NZ. We are doing this through a restructure of the Office of the Chief Executive designed to increase the capability and capacity in these specialist areas. Specifically, we are bringing in a new General Manager Risk and Assurance and General Counsel, a Principal Privacy Advisor tasked with improving privacy practices across the organisation, a Principal Risk and Assurance Advisor to better identify and manage strategic and enterprise risk, as well as increased legal capability and capacity.	Completed	31-Dec-24	DCE Office of the Chief Executive and Chief of Staff		DCE & Chief of Staff, Office of the Chief Executive
Completed	PRIVACY AND CONFIDENTIALITY	PC-03	Initiate an internal audit reviewing the process for developing Privacy Impact Assessments to provide assurance that adequate controls are in place and operating over the development and revision of Privacy Impact Assessments.	Completed	31-Dec-24	DCE Office of the Chief Executive and Chief of Staff		DCE and Chief of Staff, Office of the Chief Executive
Completed	PRIVACY AND CONFIDENTIALITY	PC-04	Establish a new Principal Privacy Advisor role to ensure implementation of best practice standards for privacy and strengthened privacy function to support the organisation.	Completed	31-Dec-24	DCE Office of the Chief Executive and Chief of Staff		General Manager Risk & Assurance / General Counsel
Completed	PRIVACY AND CONFIDENTIALITY	PC-06	Establish a new Principal Risk and Assurance Advisor role to implement best practice frameworks for risk identification, management and escalation.	Completed	31-Dec-24	DCE Office of the Chief Executive and Chief of Staff		General Manager Risk and Assurance / General Counsel
GREEN	FUTURE OPERATIONS	FO-06	Determine whether attributing prima facie individual responsibility is legally and practically possible and identify appropriate action.	Completed	31-Jan-25	Chief Executive and Government Statistician		General Manager Risk and Assurance / General Counsel
GREEN	PRIVACY AND CONFIDENTIALITY	PC-08	Refer Doug Craig's final report to the Office of the Privacy Commissioner and NZ Police, and work with them as required to address findings and recommendations.	Completed	31-Jan-25	DCE Office of the Chief Executive and Chief of Staff		DCE and Chief of Staff, Office of the Chief Executive
GREEN	ESCALATION AND ISSUE HANDLING	EIH-02	Review our policies, systems and processes against the Public Service Commission's model standards for speaking up about possible wrongdoing and improve where necessary.	Not Started	31-Mar-25	Chief Executive and Government Statistician	DCE and Chief of Staff, Office of the Chief Executive	General Manager Risk & Assurance / General Counsel
GREEN	CONTRACT MANAGEMENT AND MONITORING	CMM-05	Review Commercial Arrangements structure, mandate and business interfaces to ensure the team is appropriately resourced to ensure the above actions can be implemented and maintained.	Not Started	31-Mar-25	DCE Technology, Operations, Commercial and Collections		Head of Commercial Arrangements
GREEN	CONTRACT MANAGEMENT AND MONITORING	CMM-02	Commercial arrangements will seek advice and guidance from the Ministry of Business, Innovation and Employment and the Public Service Commission to assist the development of internal guidance on identifying and managing conflicts of interest within partner/supplier organisations and their sub-contractors.	Not Started	30-Apr-25	DCE Technology, Operations, Commercial and Collections		Head of Commercial Arrangements
GREEN	CONTRACT MANAGEMENT AND MONITORING	CMM-04	Commercial Arrangements will work with the General Manager Risk and Assurance to implement a robust risk assessment, monitoring, assurance and audit programme for all contracts.	Not Started	30-Apr-25	DCE Technology, Operations, Commercial and Collections		Head of Commercial Arrangements
GREEN	ESCALATION AND ISSUE HANDLING	EIH-03	Actively promote a 'speak up' culture, including providing all staff, particularly those with frontline community and customer facing roles, with regular advice, reminders and training around how to raise concerns and escalate complaints.	Not Started	30-Jun-25	Chief Executive and Government Statistician	DCE and Chief of Staff, Office of the Chief Executive	Chief People Officer
GREEN	ESCALATION AND ISSUE HANDLING	EIH-04	Provide comprehensive issue and risk management training to all relevant staff to enhance risk identification and awareness, particularly as it pertains to complaints and elevate organisational risk maturity.	Not Started	30-Jun-25	Chief Executive and Government Statistician	DCE and Chief of Staff, Office of the Chief Executive	General Manager Risk & Assurance / General Counsel
GREEN	ESCALATION AND ISSUE HANDLING	EIH-05	If contact centre services are outsourced we will ensure as part of the contract, complaints procedures align with Stats NZ's policies and procedures, and that a central log of all calls including complaints and issues raised is kept and provided to Stats NZ as part of the end of contract handover.	Not Started	30-Jun-25	DCE Technology, Operations, Commercial and Collections		Head of Commercial Arrangements

GREEN	FUTURE OPERATIONS	FO-07	Implement best practice cross agency data sharing practices using the data sharing standards based framework being developed by PSC.	Not Started	30-Jun-25	DCE Strategic Engagement, Māori Partnerships & Data Capability		General Manager Data Capability
GREEN	PRIVACY AND CONFIDENTIALITY	PC-05	Build and implement a proactive awareness, education and training programme to increase privacy capability and maturity of practice across the organisation.	Not Started	30-Jun-25	DCE Office of the Chief Executive and Chief of Staff		General Manager Risk and Assurance / General Counsel
GREEN	FUTURE OPERATIONS	FO-08	Undertake a review of criteria and use of incentives and infringements	Not Started	30-Jun-25	DCE Technology, Operations, Commercial and Collections		General Manager Policy, General Manager Collection Operations
GREEN	FUTURE OPERATIONS	FO-09	Establish process to ensure future collection methods are not linked with electoral processes	Not Started	30-Jun-25	DCE Technology, Operations, Commercial and Collections		Head of Commercial Arrangements, General Manager Collection Operations
GREEN	CONFLICT-OF-INTEREST	COF-01	Ensure our recently reviewed and improved declarations of interest policy is robust and fit-for-purpose as it pertains to contract management and stakeholder engagement, including the mandatory completion of conflict-of-interest statements for every third-party provider, and processes for communicating this expectation.	Planning	31-Mar-25	Chief Executive and Government Statistician		Chief People Officer, Head of Commercial Arrangements
GREEN	CONFLICT-OF-INTEREST	COF-02	Continue to strengthen our conflict-of-interest procedures including the requirement for all staff to make regular declarations.	Planning	31-Mar-25	Chief Executive and Government Statistician	DCE & Chief of Staff, Office of the Chief Executive	Chief People Officer
GREEN	CONFLICT-OF-INTEREST	COF-03	Develop a robust training and communications programme that promotes our declarations of interest policies and procedures, regularly reminding people leaders and their staff of the importance of active identification and management of conflicts-of-interest.	Planning	31-Mar-25	Chief Executive and Government Statistician	DCE & Chief of Staff, Office of the Chief Executive	Chief People Officer
GREEN	CONFLICT-OF-INTEREST	COF-05	Review how we record and manage conflict-of-interest declarations to ensure regular updating of records and the ability for key leaders, including the Head of Commercial Arrangements, to be able to complete conflict checks for transparency, oversight and ongoing management.	Planning	31-Mar-25	Chief Executive and Government Statistician		Chief People Officer
GREEN	ESCALATION AND ISSUE HANDLING	EIH-01	Review our policies, processes and procedures for managing and escalating complaints, make improvements where necessary to ensure effective escalation and management at all entry points into Stats NZ, including where services are outsourced.	Planning	31-Mar-25	Chief Executive and Government Statistician	DCE and Chief of Staff, Office of the Chief Executive	General Manager – Customer Services & Support, Senior Manager - Executive & Government Relations
GREEN	ESCALATION AND ISSUE HANDLING	EIH-06	Implement a system to record and retain calls to the main Stats NZ office/reception lines in a similar way to calls to the Information Centre.	Planning	31-Mar-25	DCE Technology, Operations, Commercial and Collections		Head of Workplace Environments
GREEN	PRIVACY AND CONFIDENTIALITY	PC-02	Review our certificates of confidentiality practices to ensure compliance is robust and meets the requirements of the Data and Statistics Act 2022. This will include standardising confidentiality certificates, a central repository (for employees (CPO) and providers/others (Legal)), and assurance that management meets best practice standards.	Planning	31-Mar-25	DCE Office of the Chief Executive and Chief of Staff		General Manager Risk and Assurance / General Counsel
GREEN	CONTRACT MANAGEMENT AND MONITORING	CMM-01	Review and improve our current procurement and contract management practices and policies to ensure they are robust and fit-for-purpose.	Planning	30-Jun-25	DCE Technology, Operations, Commercial and Collections		Head of Commercial Arrangements
GREEN	CONTRACT MANAGEMENT AND MONITORING	CMM-03	Commercial Arrangements will work in partnership with People and Capability to ensure robust conflict of interest practices are embedded in contract management policies and procedures. This will include a requirement for statements of both internal and external declarations of interest.	Planning	30-Jun-25	DCE Technology, Operations, Commercial and Collections		Head of Commercial Arrangements
GREEN	CONFLICT-OF-INTEREST	COF-04	Develop a suite of training materials and specialised practical guidance for staff who work in communities and in public facing partnership roles, including with Stats NZ Te Tiriti partners.	Planning	30-Jun-25	Chief Executive and Government Statistician	DCE Strategic Engagement, Māori Partnerships & Data Capability	Chief People Officer