
Appendix one – Response from agency



Customer
Service

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Office of the Secretary

*Our reference: COR-00552-2020
Your reference: D2001987*

Ms Margaret Crawford
Auditor-General for New South Wales
Level 19, 201 Sussex Street
Darling Park Tower 2
SYDNEY NSW 2000

Dear Ms Crawford

Thank you for the opportunity to respond to the Performance Audit, *Integrity of Data in the Births, Deaths and Marriages Register*, report for the NSW Registry of Births Deaths and Marriages (the Registry) and for the opportunity to work with your staff in this area of critical significance to our customers across NSW.

The audit assessed whether the Registry has effective controls in place to ensure the integrity of data in the civil register for the State, and to prevent unauthorised access and misuse. This also gave the Registry the opportunity to ensure that the Quality Management Systems in place are robust and to work on those areas within the business which require attention.

The audit identified some areas of opportunity for strengthening the integrity of the Register, and the recommendations of the report have been welcomed by the team. Most of those recommendations have now been implemented, with others underway. I have attached a schedule outlining the status of each for your information.

I would like to again thank you and your team for your work on this audit and the valuable insights it has provided.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Emma Hogan'.

Emma Hogan
Secretary

Date: 02/04/20

Status of recommendations

Recommendation 1: As a matter of urgency, the Department of Customer Service (DCS) should ensure that the Registry of Births Deaths & Marriages (the Registry) works with the Department of Communities and Justice (DCJ) to ensure that passwords for users authorised to access the databases and servers comply with the Department of Communities and Justice's policy on password settings.

Response: Accepted. The DCJ Chief Information Security Officer is facilitating the implementation of the DCS Password Policy to ensure compliance for all authorised users. It will be completed before 30 April 2020.

Recommendation 2: By July 2020, the Department of Customer Service should ensure that the Registry of Births Deaths & Marriages routinely monitors: privileged user activity in the Register, other user activity in the Register, including activity outside normal office hours, reporting software user activity.

Response: Accepted. The Registrar has commenced regular Privileged Access User Activity Audits and After-Hours Access Audits through the internal audit program.

Recommendation 3: By July 2020, the Department of Customer Service should ensure that the Registry of Births Deaths & Marriages restricts the ability of LifeLink users to export and distribute information from the Register outside of legitimate actions required for their role.

Response: Accepted. Information protection arrangements are being put in place to restrict the extraction, printing and emailing of LifeLink information outside of the LifeLink system, by July 2020.

Recommendation 4: By July 2020, the Department of Customer Service should ensure that the Registry of Births Deaths & Marriages updates the Service Partnership Agreement with Service NSW to include monitoring of Service NSW staff activity in the Register.

Response: Accepted. Work is underway to update the Service Partnership Agreement. Action to be completed by end of July 2020.

Recommendation 5: By July 2020, the Department of Customer Service should ensure that the Registry of Births Deaths & Marriages performs regular fraud detection audits for eRegistry users.

Response: Accepted. Regular fraud detection audits for eRegistry users have commenced.

Recommendation 6: By July 2020, the Department of Customer Service should ensure that the Registry of Births Deaths & Marriages works with the Department of Communities and Justice to ensure that there are regular access reviews of users of the databases and servers that sit behind the Register, there is regular monitoring of activity of users who have access to the databases and servers that sit behind the Register, there are regular audits to provide independent assurance that database security controls operate effectively.

Response: Accepted. An access review process is being developed jointly by the Registry, DCJ and DCS. In addition, new database security controls will be implemented, with an external audit undertaken to independently confirm the effectiveness of security controls. Action to be completed by end of July 2020.

Recommendation 7: By July 2020, the Department of Customer Service should ensure that the Registry of Births Deaths & Marriages clarifies and formalises responsibilities with the Department of Communities and Justice in relation to the management of database security.

Response: Accepted. RACI matrix is developed, and roles and responsibilities have been clearly identified. Action complete.

Recommendation 8: By December 2020, the Department of Customer Service should ensure that the Registry of Births Deaths and Marriages undertakes a risk-based analysis of the impact of gaps in the controls to prevent unauthorised user activity on the historical integrity of data in the Register.

Response: Accepted. The Registry will undertake risk analyses within the required timeframe and determine action plan required to mitigate the risks identified through the analysis. Action to be completed by end of December 2020.

Recommendation 9: By December 2020, the Department of Customer Service should ensure that the Registry of Births Deaths and Marriages implements remediating action stemming from recommendation eight.

Response: Accepted. The Registry will implement the action plan that is determined from response to recommendation 8. Action to be completed by end of December 2020.