# EXAMINATION OF THE AUDITOR GENERAL'S PERFORMANCE AUDIT REPORTS AUGUST 2019 - JUNE 2020

**Organisation:**     Department of Customer Service

**Date Received:**    21 July 2021

**Office of the Secretary**

*Our reference: COR-07066-2021*

Mr Greg Piper MP
Chair
Legislative Assembly
Public Accounts Commitee
By email: pac@parliament.nsw.gov.au


Dear Mr Piper


Thank you for your correspondence about the Auditor-General's Performance Audit Report - Integrity of data on the Births, Deaths and Marriages Registry and request for further information in relation to the information I provided in my letter dated 15 June 2021.

The Performance Audit was conducted on the NSW Registry of Births Deaths and Marriages (the Registry) to ensure effective controls are in place to safeguard the integrity of data in the civil register for the State, and to prevent unauthorised access and misuse of the data within the Register.

I have attached responses to your follow up questions to each of the mentioned recommendations, provided to me by ▮▮▮▮▮▮▮▮, the Registrar of the NSW Registry of Births, Deaths and Marriages. I trust the responses to your follow up questions provide the information you require.


Yours sincerely

Emma Hogan
**Secretary**

Date: 05/11/21

**Follow Up Questions and Responses**

**Recommendation 2:** Can you provide further information on whether the Department has implemented routine monitoring of general user activity in the Register, apart from monitoring activity outside normal office hours?

Response: Routine monitoring of general user activity in the Register is conducted in the following ways:
- Monthly review of allocated 'Roles' to staff to ensure alignment with duties have been recorded accurately, including changes to roles;
- Supervisors conduct spot checks on work conducted by their staff to ensure they are working within their delegation;
- Assurance reviews conducted on completed registrations and applications to ensure applications and registrations are compliant; and
- Blocked records and alert trigger monitoring and investigation conducted to ensure staff are not accessing records they are not entitled to access.

**Recommendation 3:** Can you provide further information on the types of information protection arrangements the Department has implemented to mitigate risk?

Response: The Department and the Registry have implemented:
- Sensitivity labelling of information on all correspondence and Microsoft 365 applications;
- Limitation of print options and ability to monitor of secure printing;
- Reporting of activity logs including printing and exporting of data from the Register;
- Training on controls for information holding proportional to their value, importance and sensitivity;
- Internal and external information sharing guidelines; and
- personnel security requirements for access to sensitive and security classified resources.

**Recommendation 4:** Can you provide further details on how the Department conducts the assurance review and the extent to which it carries out the regular monitoring of Service NSW staff activity in the Register?

Response: Fortnightly User Access reviews are conducted of the onboarded and offboarded Service NSW (SNSW) staff using the Register system to ensure only those who are activity working on Registry calls have read-only access.

A quarterly Salesforce and Quality compliance audit is conducted by SNSW and the Registry receives Quarterly compliance certificate to confirm the audit has taken place.

Blocked records and alert trigger monitoring and investigation is conducted the Registry's Identity Security Division to ensure SNSW staff are not accessing records they are not entitled to access.

**Recommendation 6:** What are some of the audit assurance processes in place to ensure that recommendation 6 has been implemented sufficiently to address the risks identified in the performance audit?

Response: Monthly User Access reviews as well as Privileged User Access reviews are conducted to ensure the Register's integrity is upheld. Segregation of the testing, pre-production and live environment is in place to ensure those working on the backend do not have access to the live Register but can still perform all functions required.

**Recommendation 8:** Can you provide further information on some of the audit assurance processes implemented to identify potential fraud and unauthorised activity?

> Response: User access is limited to the roles assigned to staff to ensure they can not access, edit or create a record without permission. Functions are segregated so that one person can not start and finalise a registration.

> Out of bandwidth (10pm-6am and weekends) logins are tracked daily and any unapproved access is investigated by ISD and reported on in the monthly Audit and Risk Committee meeting.

> High Risk Assurance Reviews are conducted monthly to ensure the integrity of the Register is upheld, potential fraud is mitigated, and unauthorised activity is identified and investigated.

**Recommendation 9:** What are some of the remediating actions implemented by the Department to prevent departed staff from accessing the Register?

> Response: On the day of departure, as per the offboarding process, the departing staff is assigned an Admin Inactive Role in the Register, preventing them from accessing any records in the Register. Additionally, DCJ deactivates the staff's Active Directory Account, resulting in a legacy account for audit purposes.

> Monthly New Starter and Departing Staff assurance reviews and Security System assurance reviews are conducted to ensure access to all systems and the premises has been disabled on the day of departure.

**Office of the Secretary**

*Our reference: BN-02979-2021*

Greg Piper MP
Chair
Legislative Assembly
Public Accounts Committee
Or via email: pac@parliament.nsw.gov.au

Dear Mr Piper

**Re: Auditor-General's performance audit report**
*Integrity of data on the Births, Deaths and Marriages Registry*

Thank you for your letter dated 7 April 2021.

The NSW Registry of Births Deaths and Marriage (the Registry) has implemented all the recommendations from the Auditor-General's report 'Integrity of data on the Births, Deaths and Marriages Registry' (schedule of recommendations attached).

It was a pleasure working with the Audit Office throughout the process. There was a high level of professionalism and collaboration and we found them to be extremely efficient. The feedback and recommendations that were made, provided the Registry with an opportunity to highlight weaknesses that were not identified through their internal auditing and quality program. This assisted the Registry in exploring appropriate remedial action that was addressed in the recommendations as part of the audit process.

The Registry didn't experience any significant cost to participate in the audit, and the recommendations for action were of minimum cost to implement.

We welcome working with the Audit Office again.

Yours sincerely
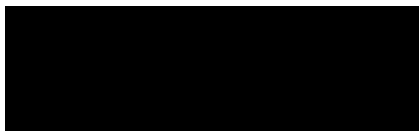
Emma Hogan
**Secretary**

Date: 15/06/21

# IMPLEMENTATION OF RECOMMENDATIONS

**Department of Customer Service (DCS)**

**Integrity of data on the Births, Deaths and Marriages Registry – NSW Registry of Births Deaths and Marriages (the Registry)**

| | RECOMMENDATION | ACCEPTED OR REJECTED | ACTIONS TO BE TAKEN | DUE DATE | STATUS (completed, on track, delayed) **and** COMMENT | RESPONSIBILITY (Section of agency responsible for implementation) |
|---|---|---|---|---|---|---|
| 1 | DCS to work with Department of Communities and Justice Chief (DCJ) to ensure passwords for users authorised to access the databases and servers comply with the DCS policy on password settings. | Accepted | DCJ to use DCS existing password policy to ensure passwords for authorised users comply with DCS password policy DCJ Information Security Officer has facilitated this change and the password policy has now been implemented by DCJ. . | 30 April 2020 | Completed 30 April 2020. | Department of Communities and Justice |
| 2 | Routine monitoring: privileged user activity in the Register, other user activity in the Register, including activity outside normal office hours, Tableau software user activity. | Accepted | DCS in collaboration with DCJ and the Registry have defined a RACI matrix to implement access reviews to fully address privileged user activity in the Register, inclusive of other activity outside of normal business hours and Tableau software user activity.<br><br>Internal audit program now includes regular privileged access user activity audits and after-hours access audits. | 31 July 2020 | Completed July 2020 | NSW Registry of Births, Deaths and Marriages |
| 3 | Restricts the ability of LifeLink users to export and distribute information from the Register | Accepted | The function is required to perform duties; however, information | 31 July 2020 | Completed July 2020 | NSW Registry of Births, Deaths and Marriages |

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| | outside of legitimate actions required for their role. | | protection arrangements are in place to mitigate risk. | | | |
| 4 | DCS to ensure that the Registry Service Partnership Agreement with Service NSW (SNSW) to include monitoring of Service NSW Staff activity in the Register. | Accepted | DCS have worked in partnership with SNSW and the Registry and updated the Service Partnership Agreement. Assurance Reviews are also performed regularly that encompass fraud detection. | 31 July 2020 | Completed July 2020 | NSW Registry of Births, Deaths and Marriages |
| 5 | Perform regular fraud detection audits for eRegistry users. | Accepted | Audits are performed regularly. | 31 July 2020 | Completed July 2020 | NSW Registry of Births, Deaths and Marriages |
| 6 | Regular access reviews of users of the databases and servers that sit behind the Register; regular monitoring of activity of users who have access to the databases and servers; regular audits to provide independent assurance that database security controls operate effectively. | Accepted | Advice from technical team received stating this is now in place. | 31 July 2020 | Completed July 2020 | Department of Communities and Justice |
| 7 | DCS clarifies and formalises responsibilities with the DCJ in relation to the management of database security. | Accepted | RACI matrix is developed, and roles and responsibilities have been clearly outlined and accepted. | 31 July 2020 | Completed Jul 2020 | NSW Registry of Births, Deaths and Marriages |
| 8 | The Registry 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. | Accepted | DCS, in collaboration with the Regisgtry and DCJ, will agree on the audit assurance process.<br><br>Risks identified analysed and included on risk register. | 30 Dec 2020 | Completed Dec 2020 | NSW Registry of Births, Deaths and Marriages |
| 9 | DCS ensures the Registry. implements remediating action stemming from recommendation eight. | Accepted | Remediating action implemented to prevent staff who have departed the Registry from accessing the Register. Regular audits and checks against establishment. | 30 Dec 2020 | Completed Dec 2020 | NSW Registry of Births, Deaths and Marriages |