Privacy Maturity Assessment Framework (PMAF)
Self-assessment report 2024

Ngā Pirihimana o Aotearoa | New Zealand Police

Ahakoa he iti, he pounamu.

Although it is small, it is of great value.

Message from the Government Chief Privacy Officer

Thank you for sending us your PMAF reports for 2023/24. It is excellent to see the progress that many agencies have been able to make during the year, despite obvious pressures on your time and energy.

This is the last report under the PMAF

As you will be aware, the Department has disestablished the GCPO function as part of our baseline reduction programme. **You will therefore not be asked to submit a PMAF return in future.**

This report:

- gives you a view of your maturity (and maturity across the system) for the last three years, so that you have a clear view of progress
- shows how your maturity compares with your peer agencies, so that you can more easily continue to target priorities for improvement
- shows how agencies across the system have responded to the focus areas that GCPO set out in 2023, so that you can identify any further work that you wish to do in those areas.

While this level of reporting is more limited than in previous years, we hope that you still find it valuable.

We encourage you to continue to use the PMAF as an internal tool

While external reporting will no longer be required, the PMAF is still relevant and valuable, and we encourage you to continue to use it to support your agency's ongoing privacy maturity journey:

- it enables you to develop a workplan so you can maintain or improve maturity in areas that help you keep the trust of people whose information you hold and that are relevant to core public service value
- it makes sure you take a systemic approach to privacy, rather than a more limited compliance perspective
- it enables you to measure progress in a way that can easily be reported to governance groups or other senior leaders

it will enable you to be more confident that you meet the Privacy Commissioner's regulatory expectations set out in Poupou Matatapu Doing privacy well, which are strongly aligned with the PMAF. You can find the Poupou Matatapu guidance at https://privacy.org.nz/responsibilities/poupou-matatapu-doing-privacy-well/
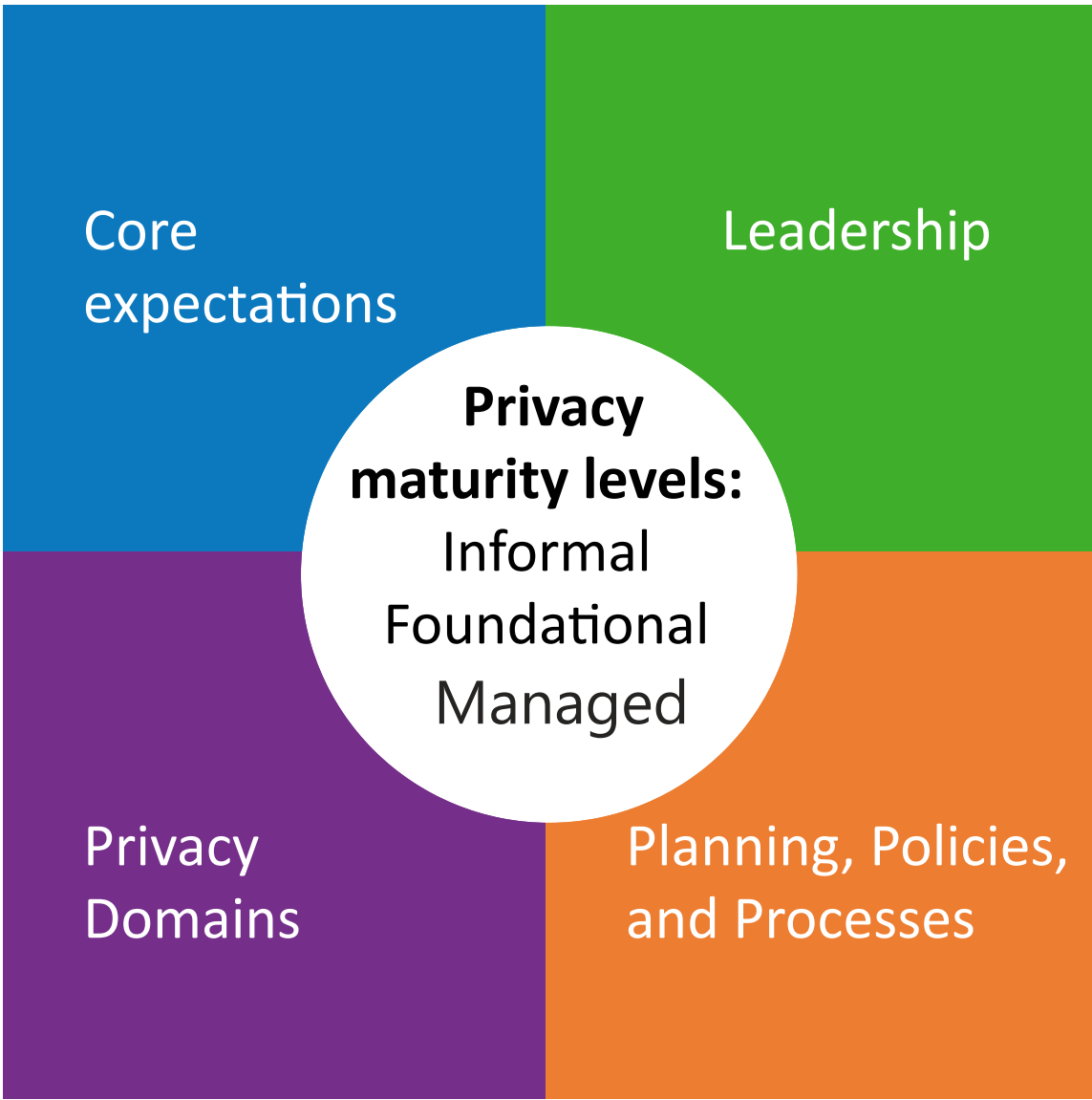
Government Chief Privacy Officer
August 2024

Core Expectations

CE1: Take a people-centred approach to privacy that is respectful of those the information is about and provides the public with effective services.

CE2: Build and maintain a privacy culture that embodies the public service values of being impartial, accountable, trustworthy, respectful, and responsive.

CE3: Build and maintain privacy capability so that people have the knowledge and skills they need to contribute to good privacy practice.

CE4: Establish a sense of collective accountability in which managers and staff understand their duty to ensure that personal information is collected and used appropriately.

CE5: Be a capable Treaty partner by supporting the Crown to fulfil its stewardship responsibility and strengthen the Crown's relationships with Māori.

Leadership

L1: Effective oversight for privacy practice through effective governance.

L2: Delivery of objectives through management structure, roles and responsibilities, and the capacity to achieve these objectives.

L3: Confidence in organisational progress through appropriate monitoring and assurance practices.

Planning, Policies and Practice

P1: Strategy and planning: Formulate a privacy approach, a strategy for achieving it and a roadmap to bring it to life.

P2: Competent practice: Have policies to equip managers and staff to play their part in achieving the core expectations.

Core expectations | Leadership

Privacy maturity levels:
Informal
Foundational
Managed

Privacy Domains | Planning, Policies, and Processes

Privacy Domains

PD1: Require a clear understanding of the purpose and necessity of the collection, use and sharing of personal information.

PD2: Ensure the use and storage of personal information protects against inappropriate access, use, and modification, whilst also ensuring effective and efficient support for its intended use.

PD3: Make it easy for people to access and request correction to their information.

PD4: Understand and assess privacy risks and manage commensurately.

PD5: Reduce the impact of privacy breaches and incidents through good privacy practices.

PD6: Enable personal information use, reuse and sharing to support a unified public service that provides the public with effective services.

Maturity level: Informal
- the agency's approach to privacy is unstructured
- privacy is generally seen as a compliance exercise
- planning and implementing the agency's privacy work programme and other privacy activities needs to be developed.

Maturity level: Foundational
- an agency-wide approach to privacy is developing
- good privacy practices are siloed, happening at the individual and team level rather than at the agency-wide level
- planning and implementing the agency's privacy work programme and other privacy activities is more tactical and often occurs at the individual initiative and team level rather than at the agency-wide level.
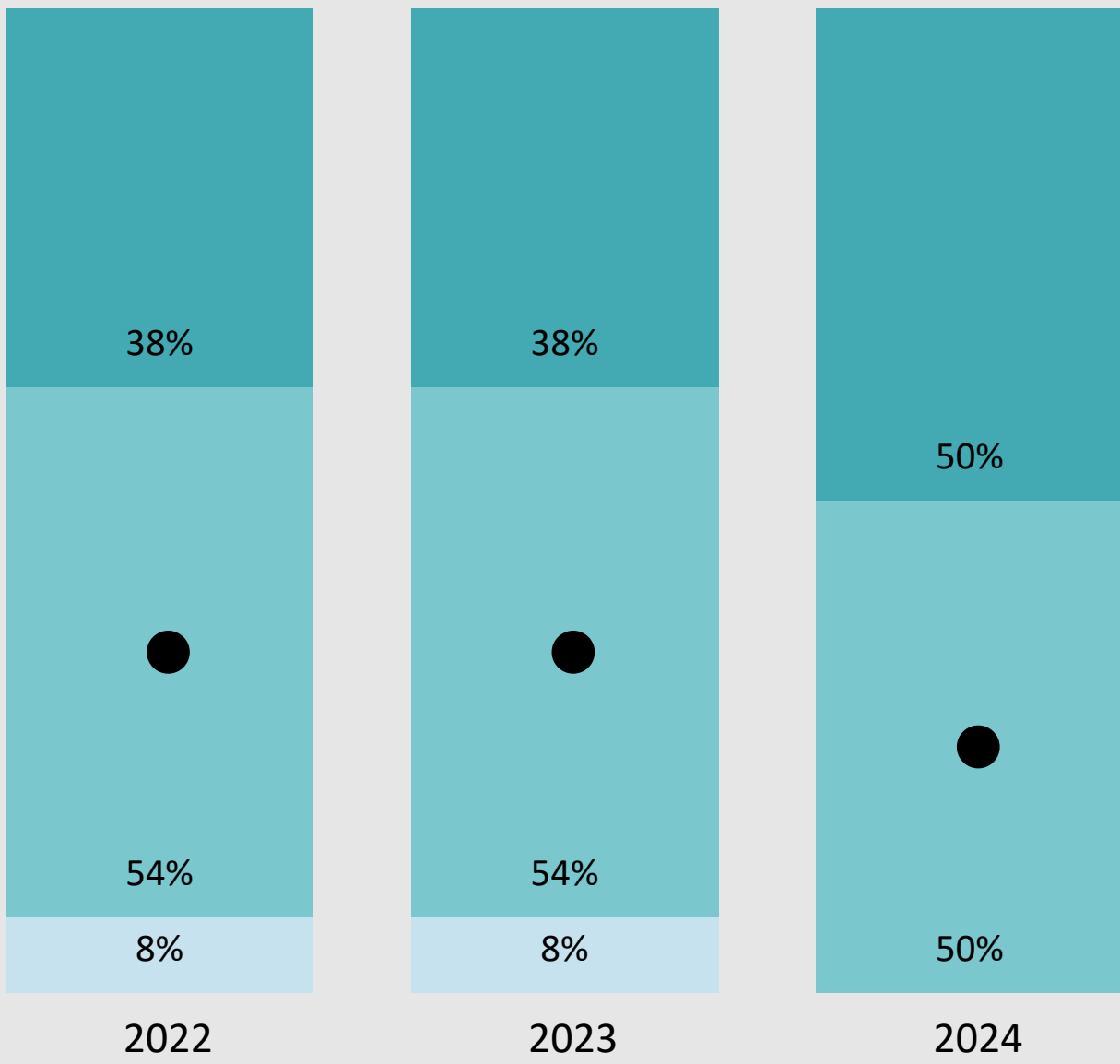
Maturity level: Managed
- the agency's approach to privacy is comprehensive and commensurate with its need
- good privacy practices are part of the agency's privacy culture
- planning and implementing the agency's privacy work programme and other privacy activities are strategic and appropriately resourced.

	Core Expectations	Leadership	Planning, Policies & Practice	Privacy Domains
Agency Maturity	Foundational	Managed	Managed	Managed

% Sections at each level

Core Expectations — Informal, Foundational, Managed, Your Agency

	2022	2023	2024
Managed	30%	30%	46%
Foundational	61%	68%	54%
Informal	9%		

Leadership — Informal, Foundational, Managed, Your Agency

	2022	2023	2024
Managed	30%	34%	43%
Foundational	68%	64%	57%

Planning, Policies & Practice — Informal, Foundational, Managed, Your Agency

	2022	2023	2024
Managed	43%	43%	57%
Foundational	50%	57%	43%

Privacy Domains — Informal, Foundational, Managed, Your Agency

	2022	2023	2024
Managed	36%	34%	48%
Foundational	59%	66%	52%

Highest managed criteria (all agencies)

Core Expectations:
- CE 1.3 Being transparent 65%
- CE 2.3 Developing privacy awareness 61%
- CE 1.1 People-centred privacy programme 54%

Leadership:
- L 1.1 Privacy reporting 67%
- L 2.3 Oversight and visibility 65%
- L 2.2 Resourcing 52%

Planning, Policies & Practice:
- PPP 2.1 Policies 76%
- PPP 2.2 Procurement contracts 65%
- PPP 1.1 Privacy planning 46%

Privacy Domains:
- PD 2.1 Implementing Privacy by Design 72%
- PD 6.1 Policies for sharing personal info. 67%
- PD 4.1 Knowing agency risks 67%

Lowest managed criteria (all agencies)

Core Expectations:
- CE 3.3 Additional privacy training 37%
- CE 5.1 Identifying Māori privacy interests 22%
- CE 5.2 Partnering with Māori 20%

Leadership:
- L 1.2 Privacy and risk management 50%
- L 2.1 Responsibility and accountability 39%
- L 3.1 Privacy and assurance 37%

Planning, Policies & Practice:
- PPP 1.3 Reporting 46%
- PPP 1.2 Planning documents 39%

Privacy Domains:
- PD 3.3 Reviewing the process 39%
- PD 5.3 Retaining personal information 39%
- PD 1.2 Identifying choices 30%

At a glance: agency compared to category

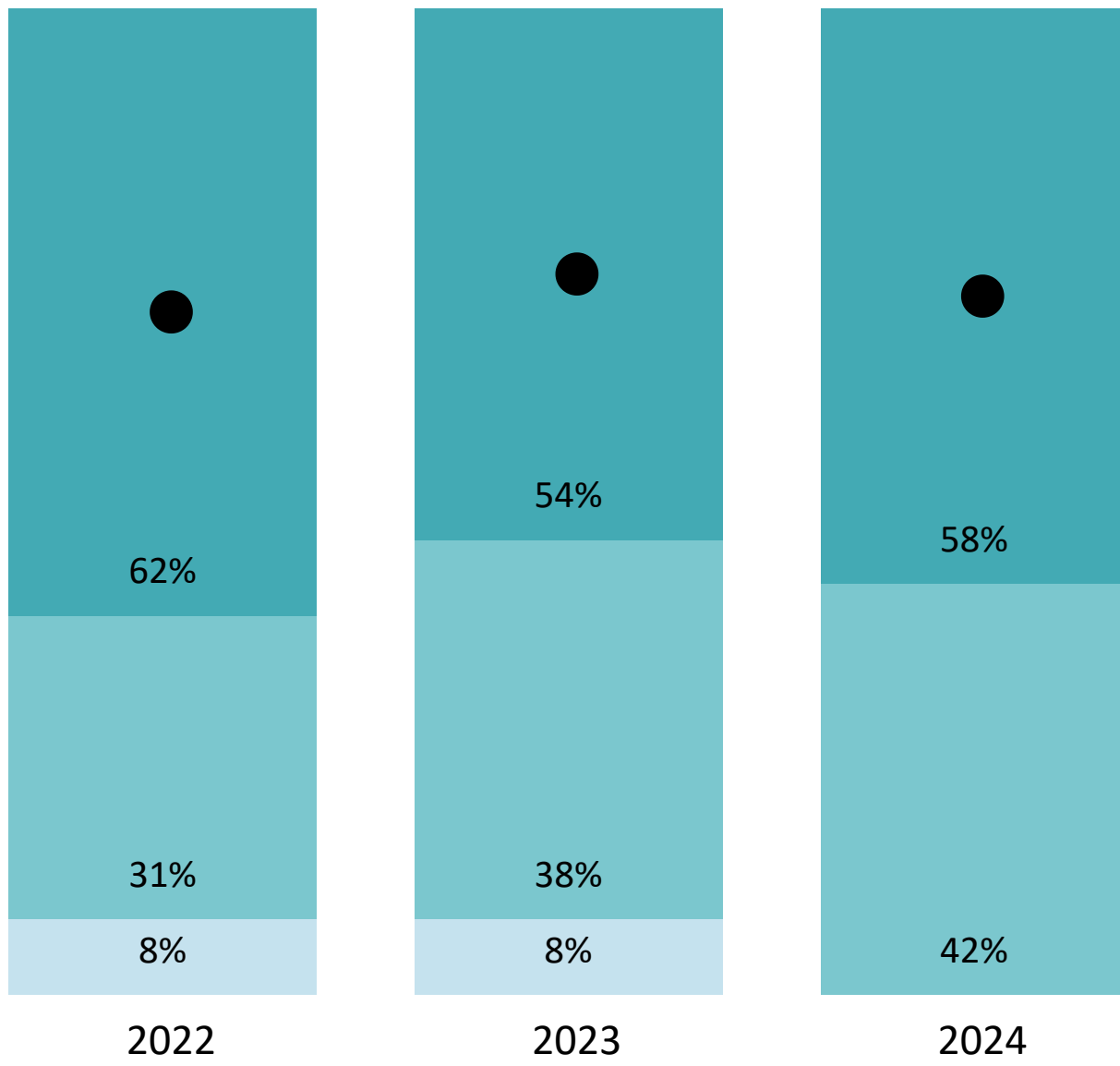● Informal ● Foundational ● Managed ● Your Agency

- 2022: 38%, 54%, 8%
- 2023: 38%, 54%, 8%
- 2024: 50%, 50%

CE1: People-centred

● Informal ● Foundational ● Managed ● Your Agency

- 2022: 62%, 31%, 8%
- 2023: 54%, 38%, 8%
- 2024: 58%, 42%

CE2: Privacy culture

● Informal ● Foundational ● Managed ● Your Agency

- 2022: 54%, 38%, 8%
- 2023: 62%, 31%, 8%
- 2024: 50%, 33%, 17%

CE3: Privacy capability

● Informal ● Foundational ● Managed ● Your Agency

- 2022: 31%, 54%, 15%
- 2023: 38%, 62%
- 2024: 58%, 42%
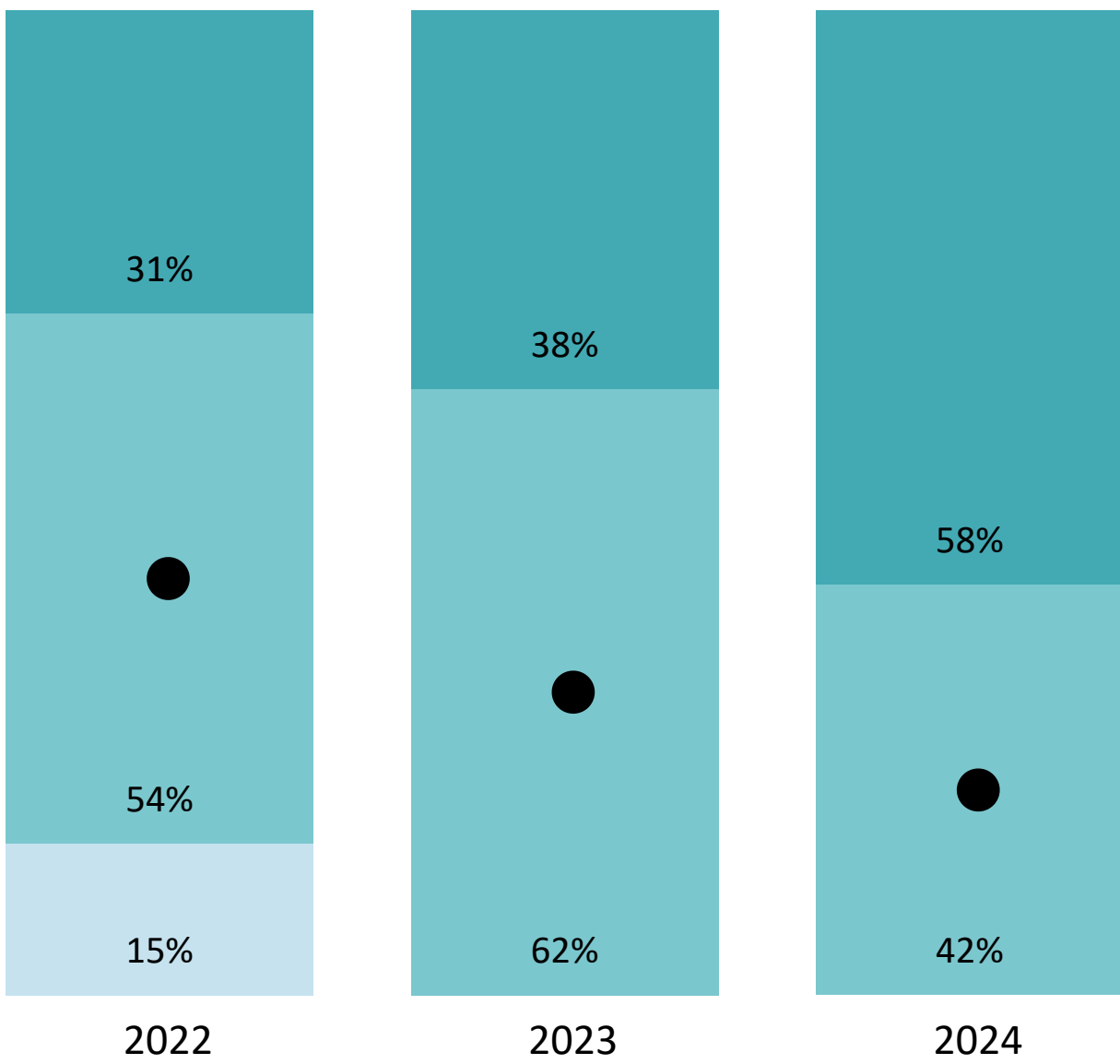
CE4: Collective accountability

● Informal ● Foundational ● Managed ● Your Agency
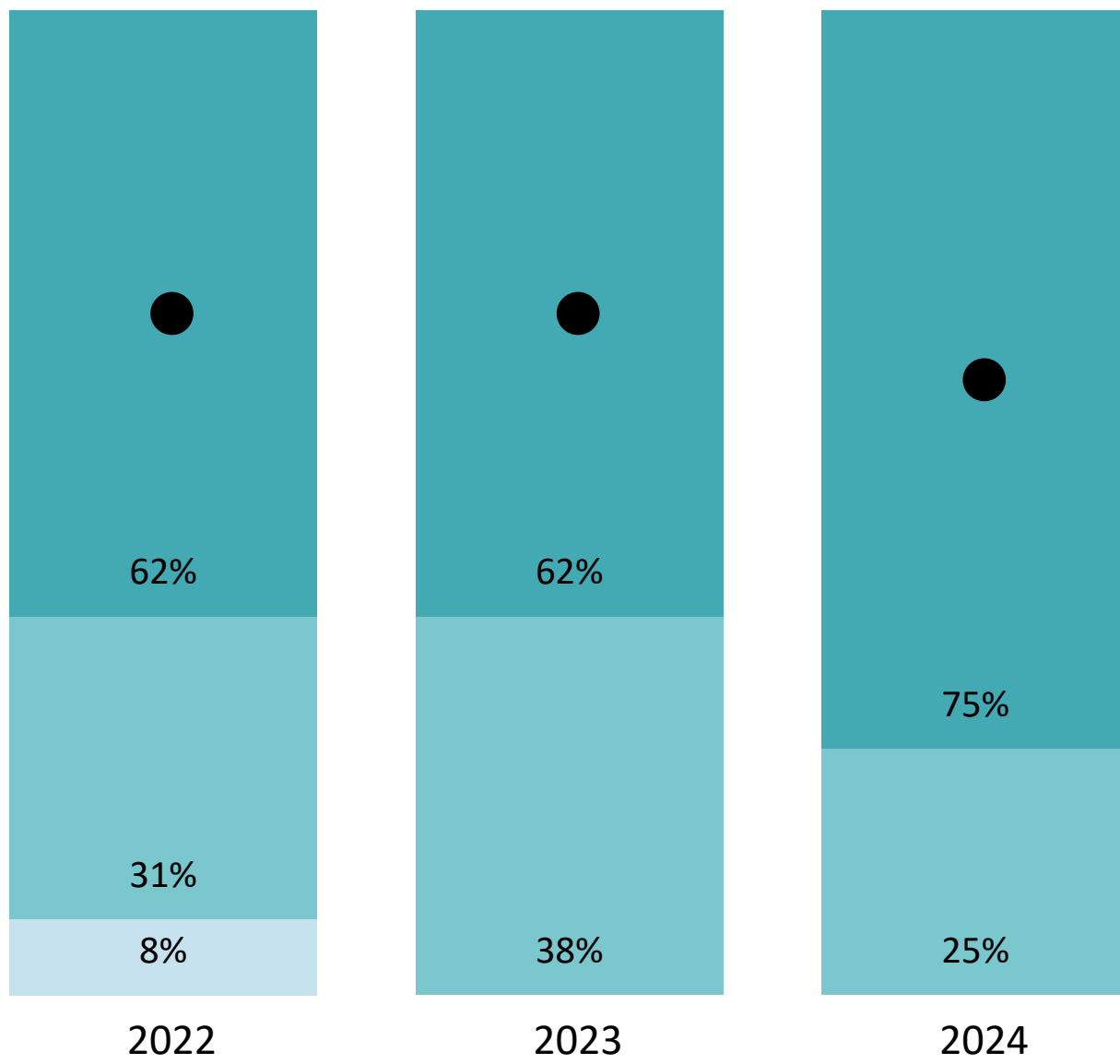
- 2022: 62%, 31%, 8%
- 2023: 62%, 38%
- 2024: 75%, 25%

CE5: Capable Treaty partner

● Informal ● Foundational ● Managed ● Your Agency

- 2022: 69%, 31%
- 2023: 69%, 31%
- 2024: 8%, 67%, 25%

Explanation of category

Category 1: These 13 agencies have large amounts of personal information and/or use personal information for multiple purposes. Category 2: These 34 agencies have small amounts of personal information and/or only use personal information for one purpose.

Charts with gold outline are detailed further on the page *Comments on four priority development areas 2023-24*

IN-CONFIDENCE

Leadership: agency results compared to category 1

At a glance: agency compared to category
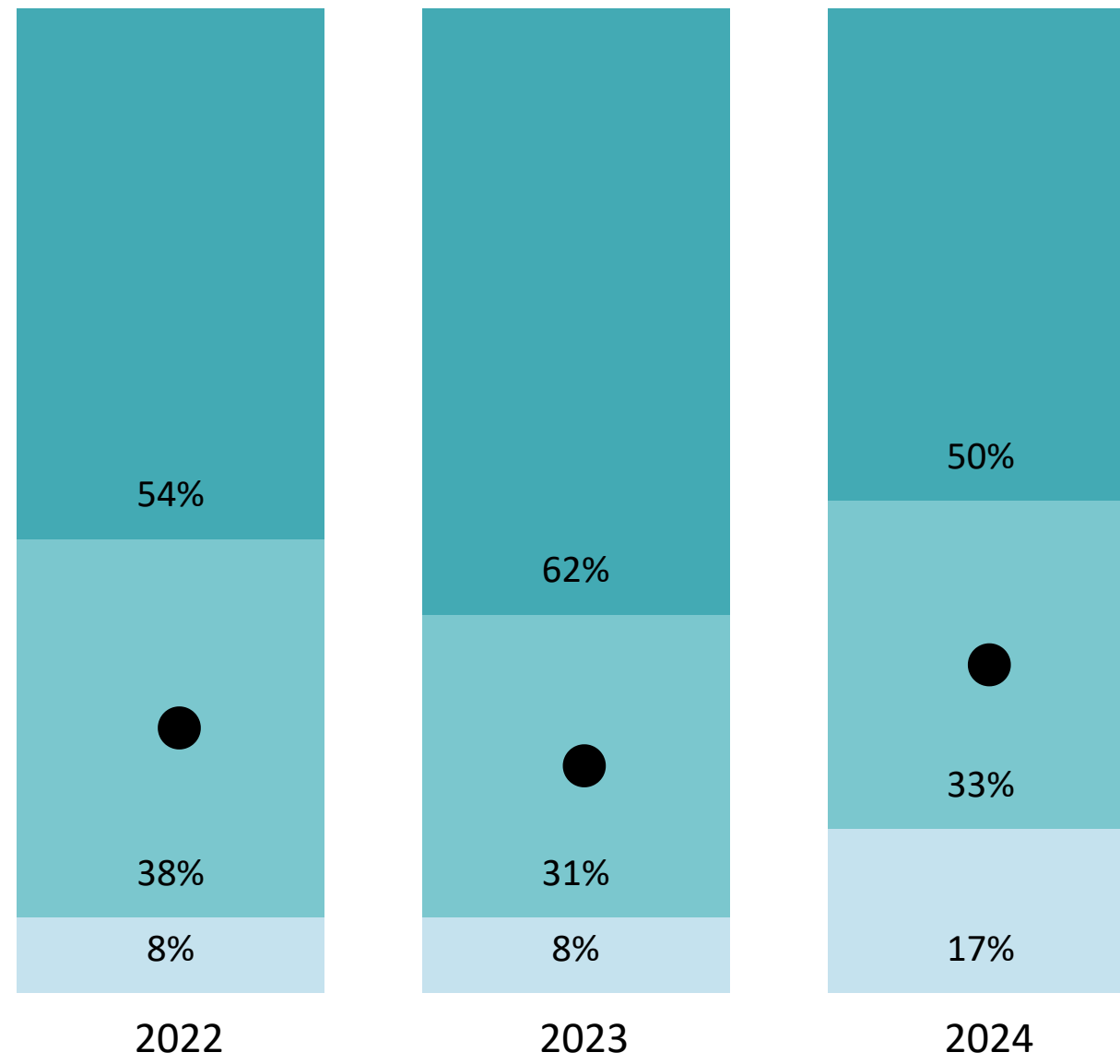
● Foundational ● Managed ● Your Agency

Year	Managed	Foundational
2022	46%	54%
2023	46%	54%
2024	50%	50%

L1: Effective oversight

● Foundational ● Managed ● Your Agency

Year	Managed	Foundational
2022	38%	62%
2023	46%	54%
2024	50%	50%

L2: Delivery of objectives

● Foundational ● Managed ● Your Agency
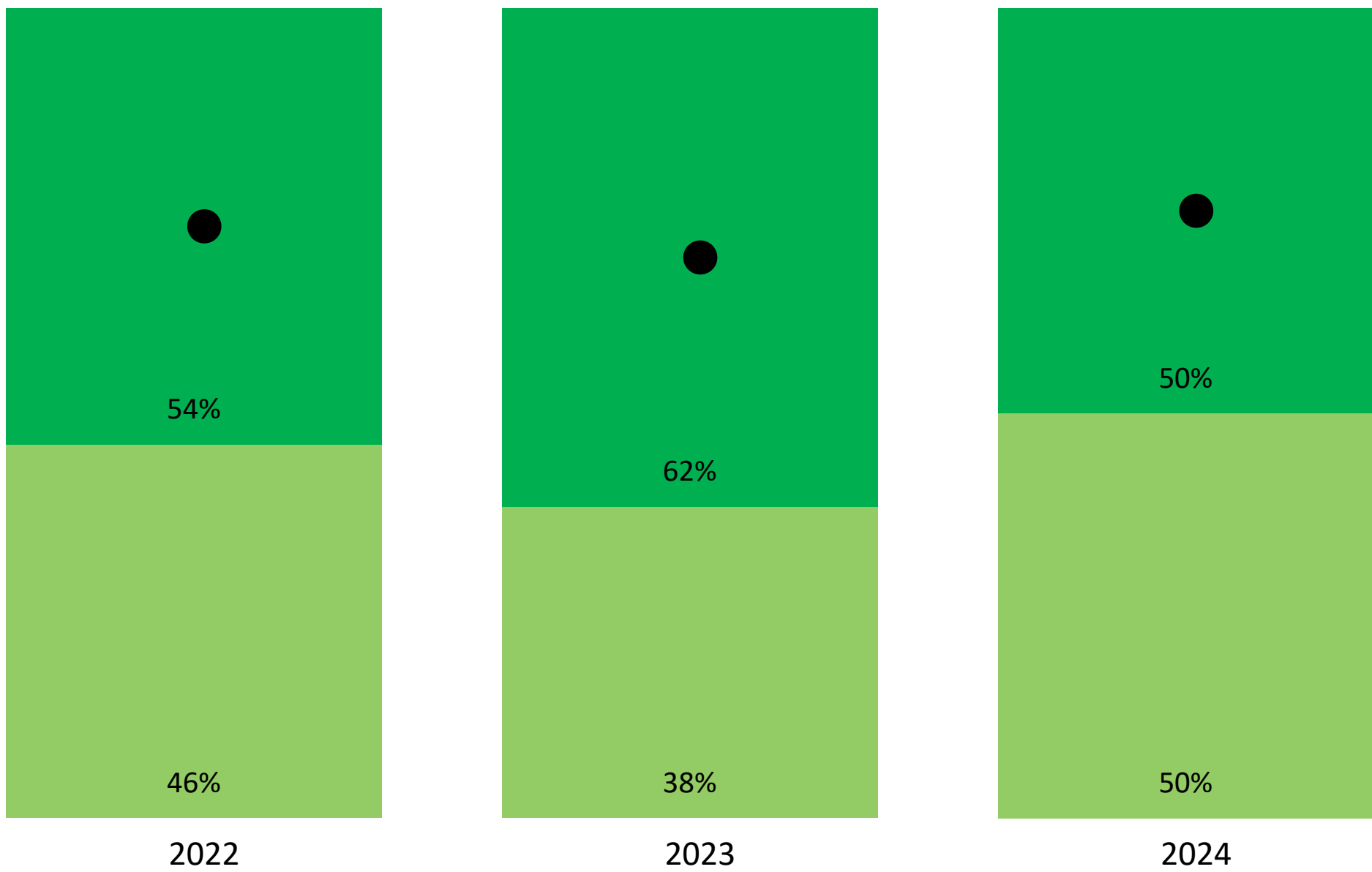
Year	Managed	Foundational
2022	54%	46%
2023	62%	38%
2024	50%	50%

L3: Confidence in organisational progress

● Informal ● Foundational ● Managed ● Your Agency

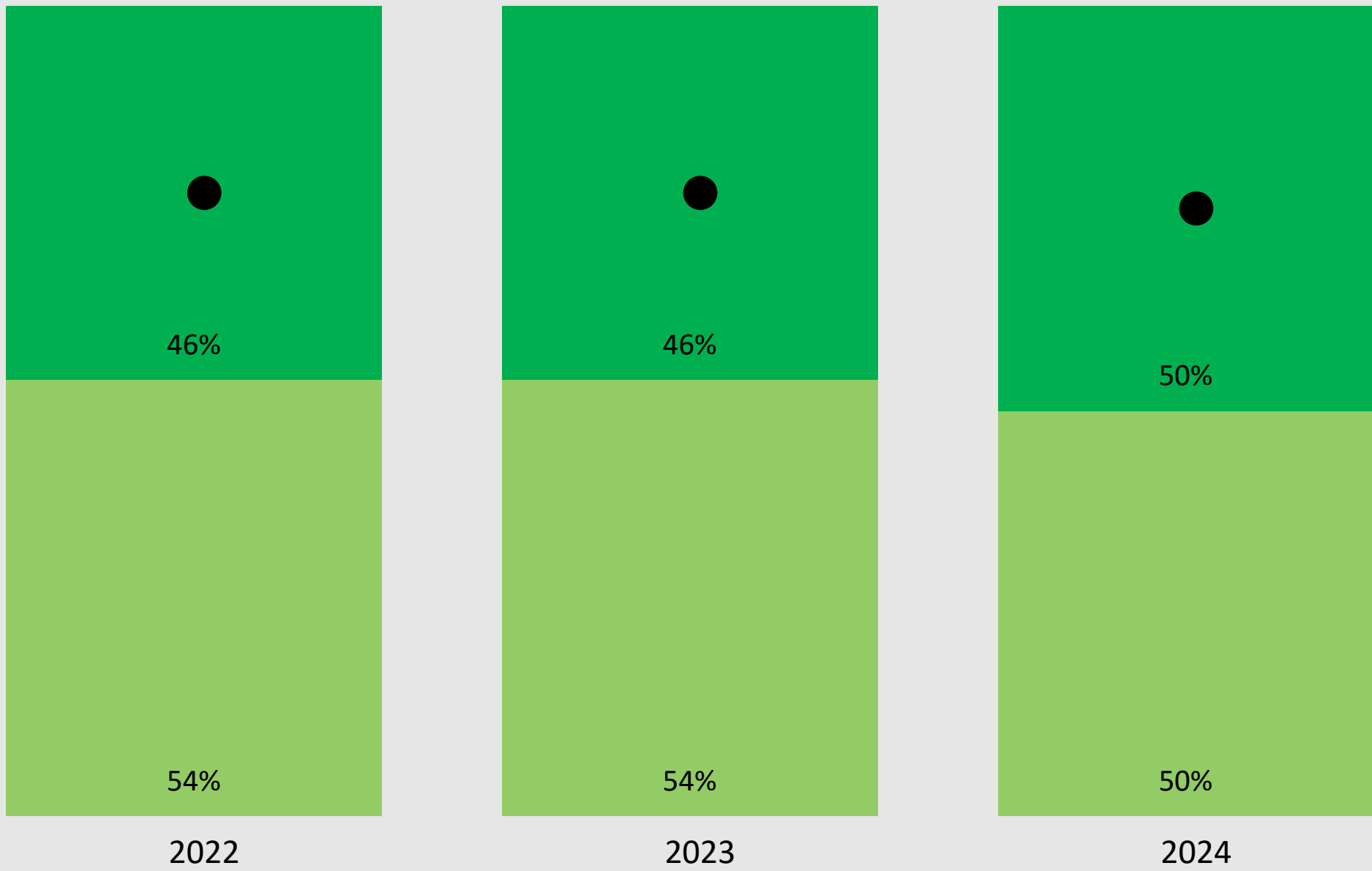| Year	Managed	Foundational	Informal
2022	31%	62%	8%
2023	31%	54%	15%
2024	33%	42%	25%

Explanation of category

Category 1: These 13 agencies have large amounts of personal information and/or use personal information for multiple purposes. Category 2: These 34 agencies have small amounts of personal information and/or only use personal information for one purpose.

Charts with gold outline are detailed further on the page *Comments on four priority development areas 2023-24*
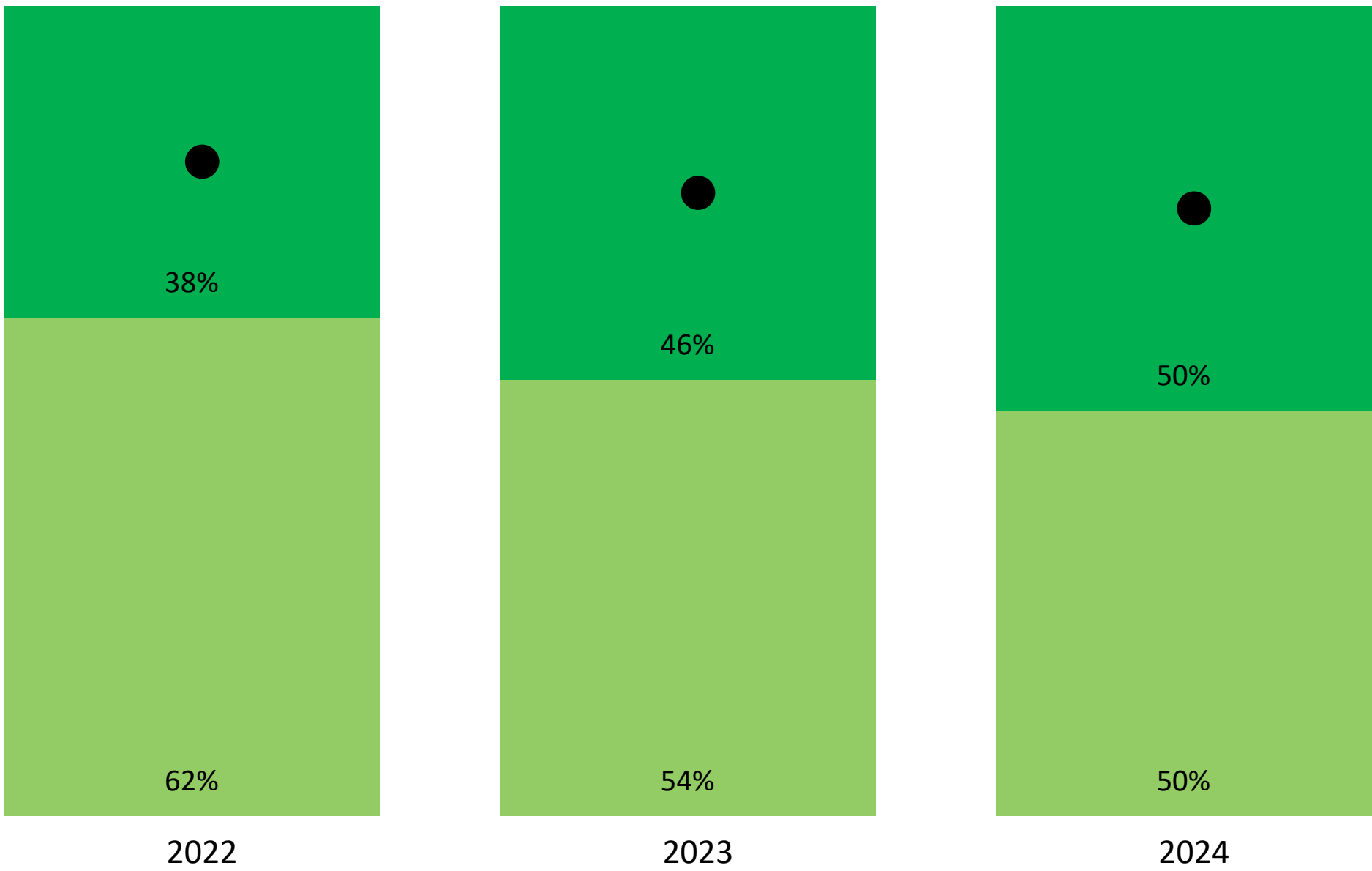
IN-CONFIDENCE

Planning, Policies and Processes: agency results compared to category 1

New Zealand Police

Te Tari Taiwhenua
Internal Affairs

At a glance: agency compared to category

● Informal ● Foundational ● Managed ● Your Agency

	2022	2023	2024
Managed	62%	62%	58%
Foundational	31%	38%	42%
Informal	8%		

PPP1: Strategy and planning

● Informal ● Foundational ● Managed ● Your Agency

	2022	2023	2024
Managed	54%	54%	50%
Foundational	38%		
Informal	8%	46%	50%

PPP2: Competent practice

● Informal ● Foundational ● Managed ● Your Agency

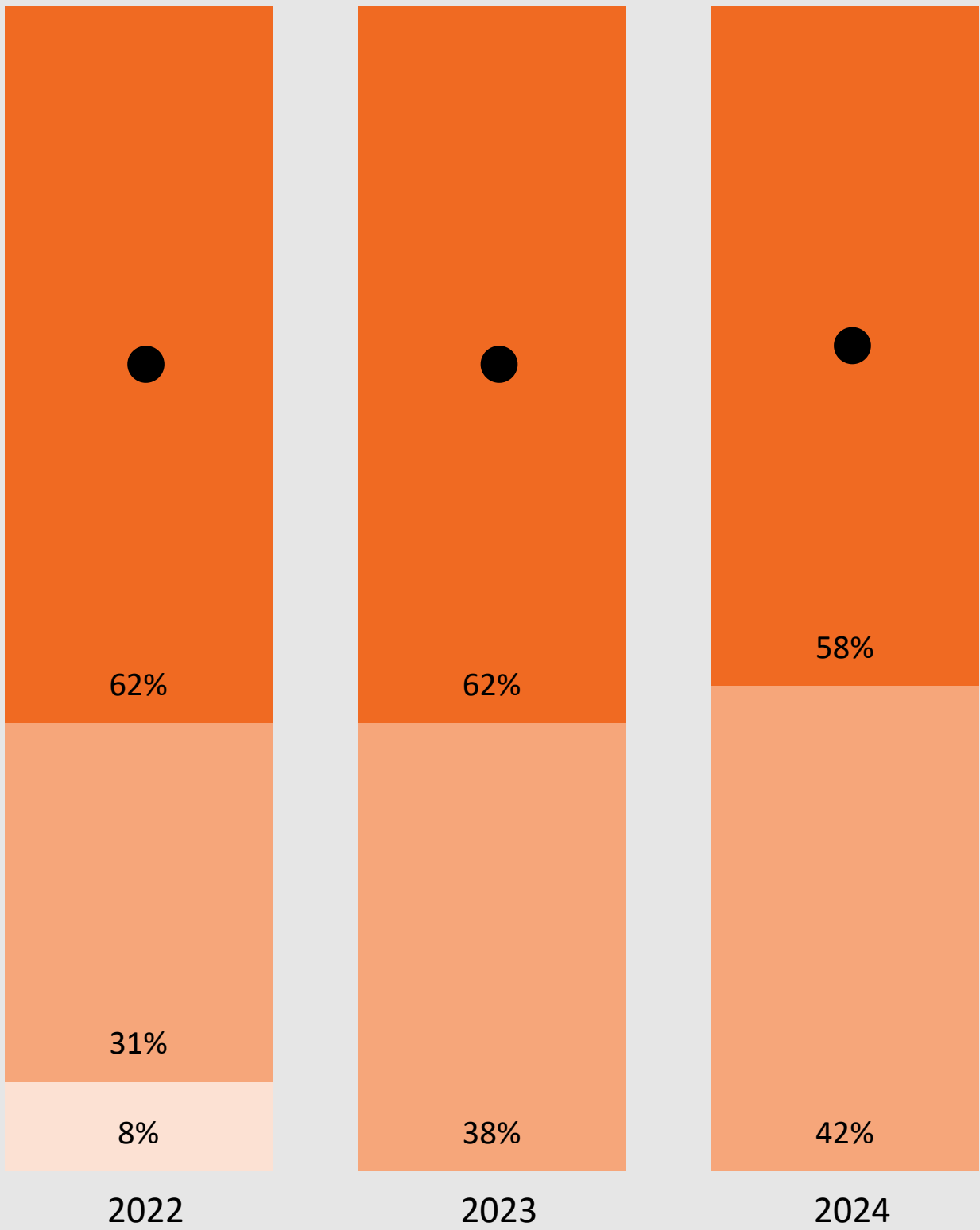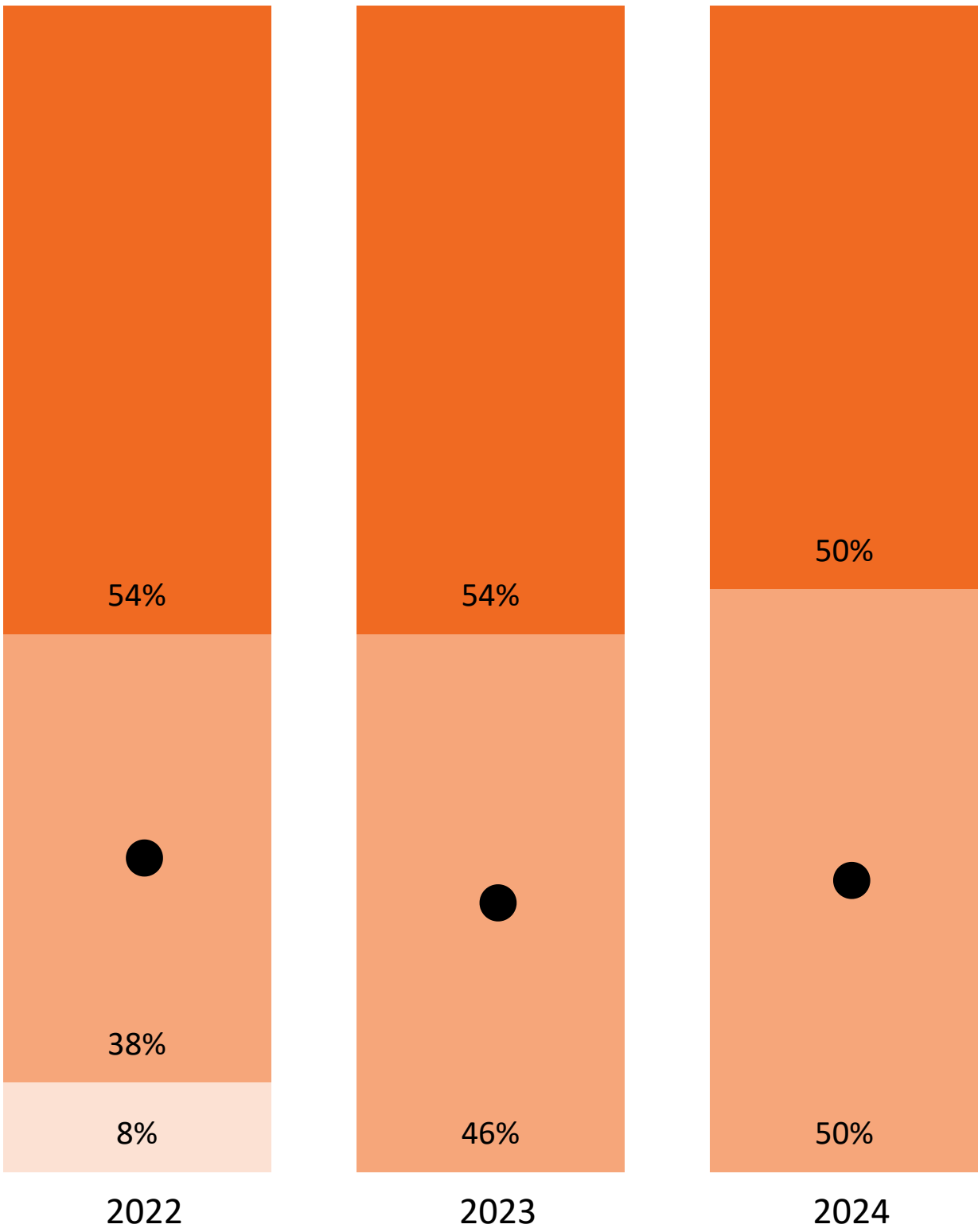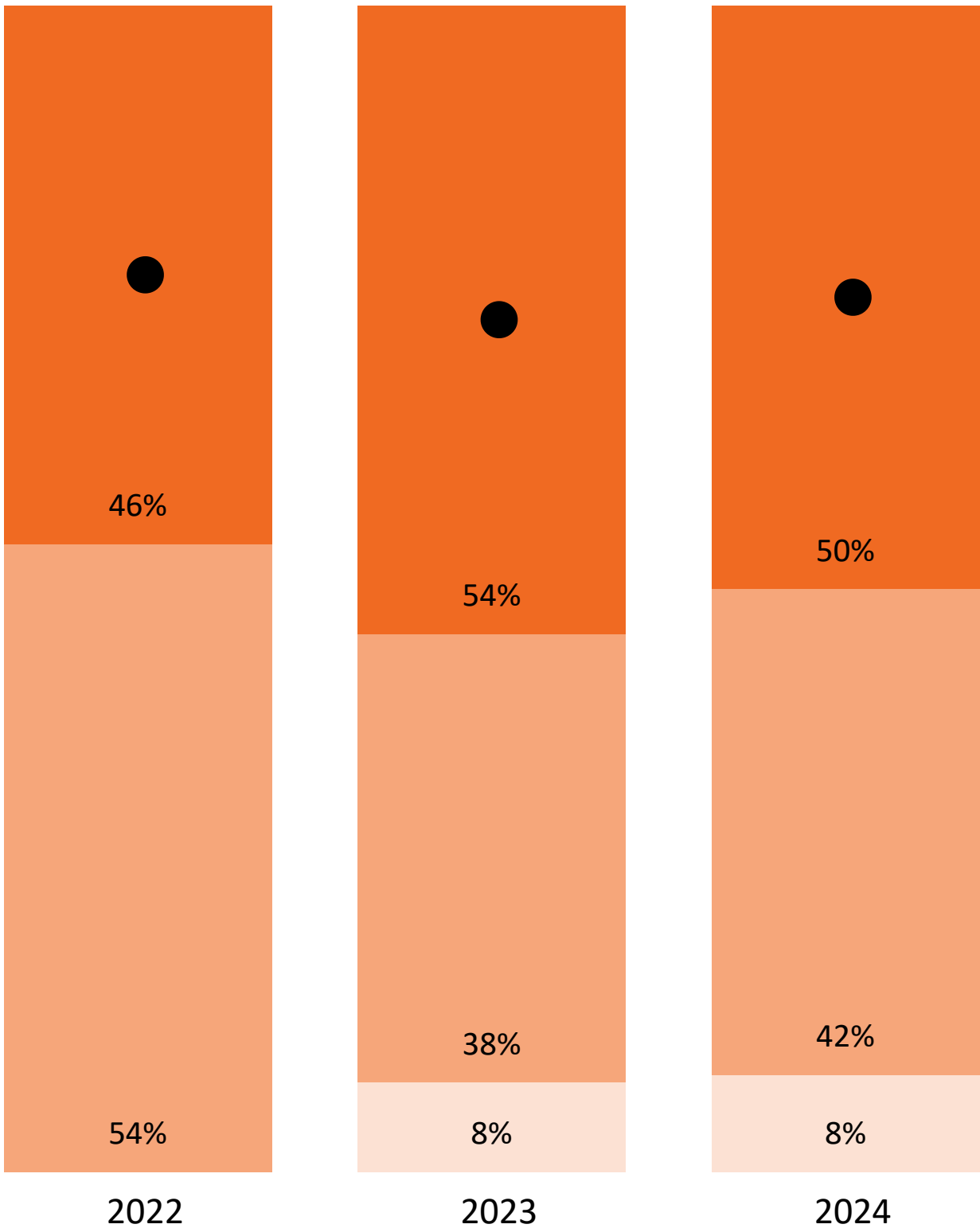|	2022	2023	2024
Managed	46%	54%	50%
Foundational	54%	38%	42%
Informal		8%	8%

Explanation of category

Category 1: These 13 agencies have large amounts of personal information and/or use personal information for multiple purposes. Category 2: These 34 agencies have small amounts of personal information and/or only use personal information for one purpose.

IN-CONFIDENCE

Privacy Domains: agency results compared to category 1

At a glance: agency compared to category
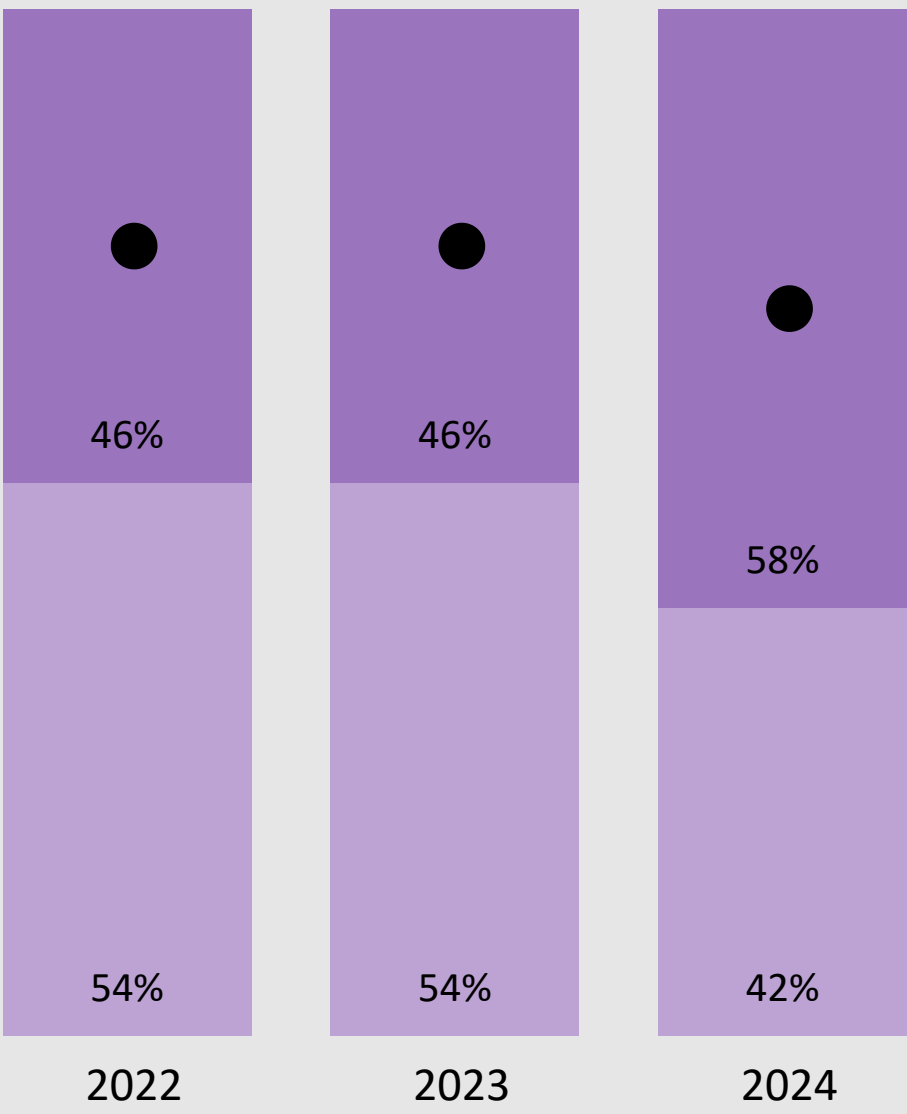● Foundational ● Managed ● Your Agency

Year	Managed	Foundational
2022	46%	54%
2023	46%	54%
2024	58%	42%

PD1: Require a clear understanding of the purpose
● Informal ● Foundati... ● Managed ● Your Age...
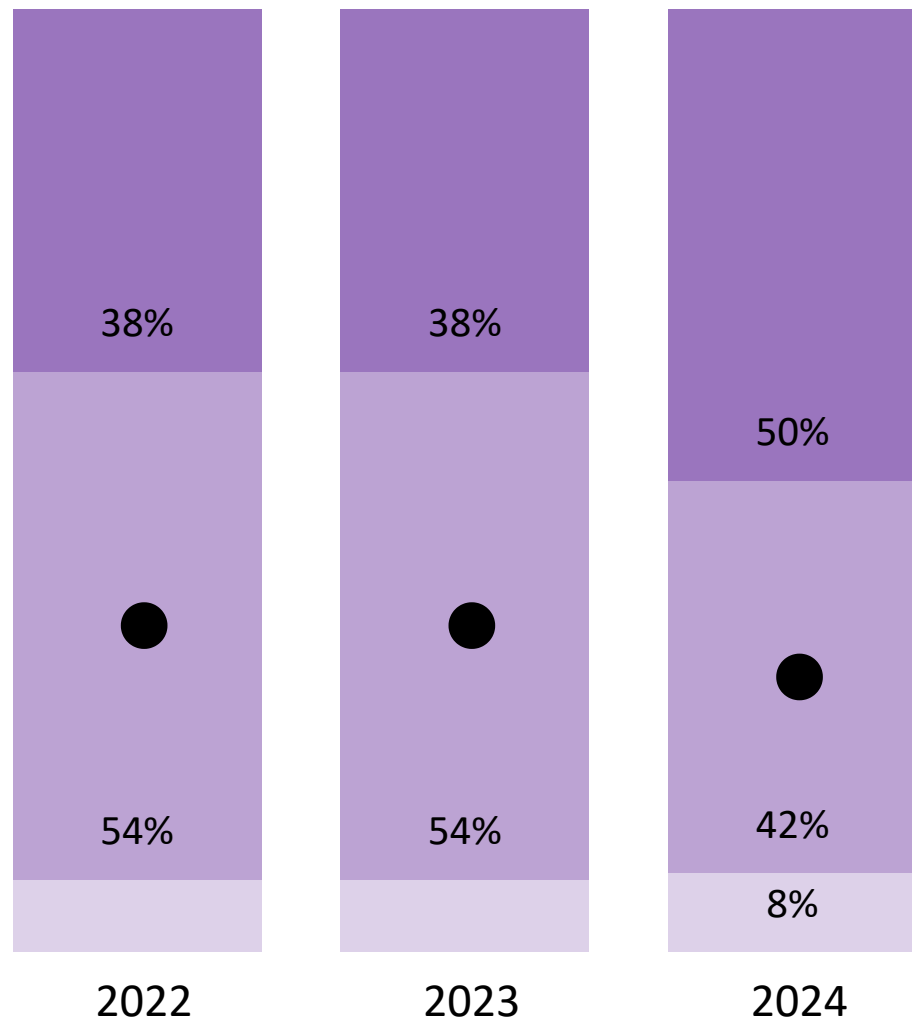
Year	Managed	Foundational	Informal
2022	38%	54%	
2023	38%	54%	
2024	50%	42%	8%

PD2: Ensure the use and storage of personal information
● Foundational ● Managed ● Your Agency

Year	Managed	Foundational
2022	54%	46%
2023	46%	54%
2024	67%	33%
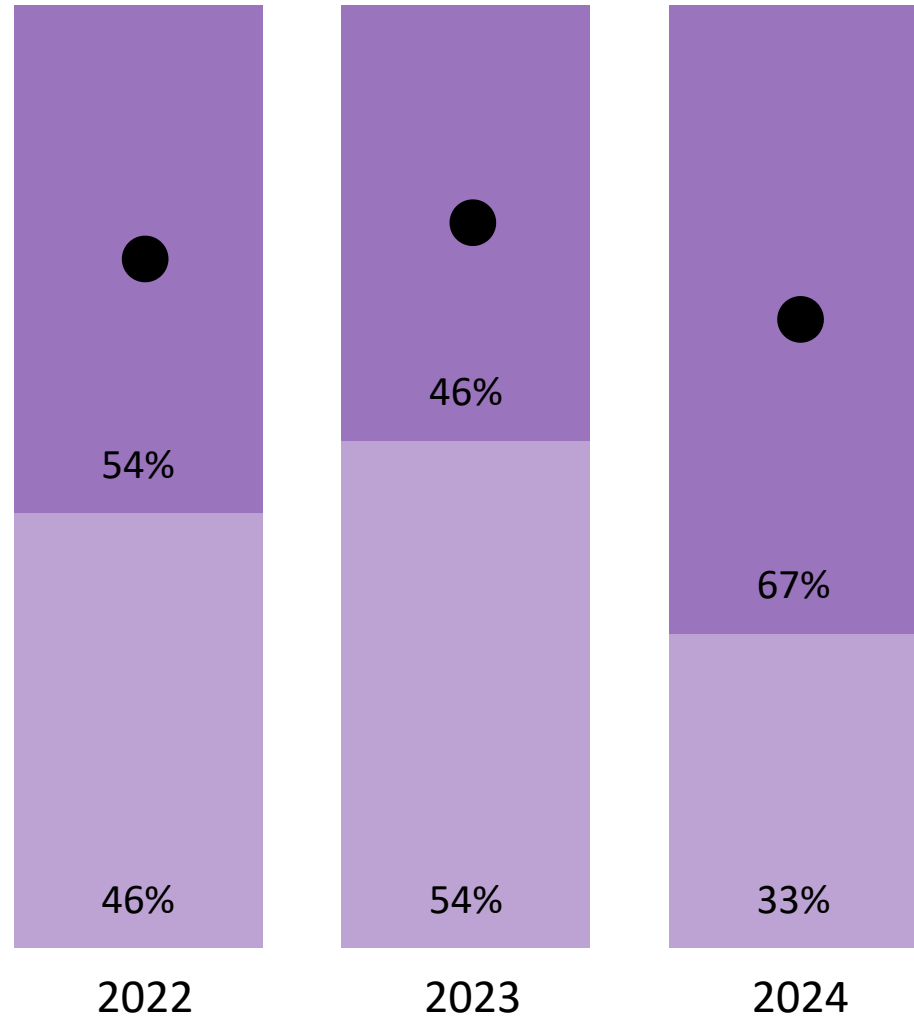
PD3: Make it easy for people to access
● Informal ● Foundati... ● Managed ● Your Age...

Year	Managed	Foundational	Informal
2022	46%	46%	8%
2023	46%	54%	
2024	50%	50%	
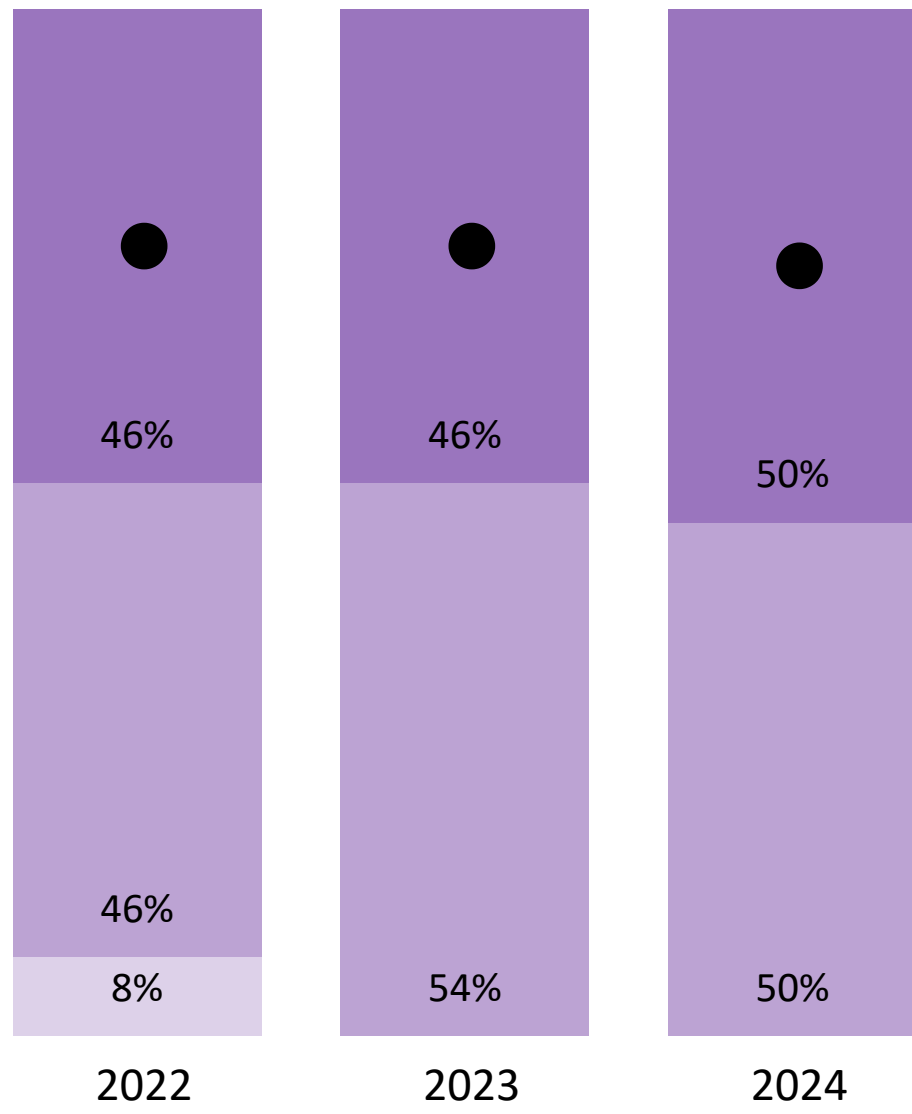
PD4: Understand and assess privacy risks
● Informal ● Foundati... ● Managed ● Your Age...

Year	Managed	Foundational	Informal
2022	62%	31%	8%
2023	54%	38%	8%
2024	50%	42%	8%
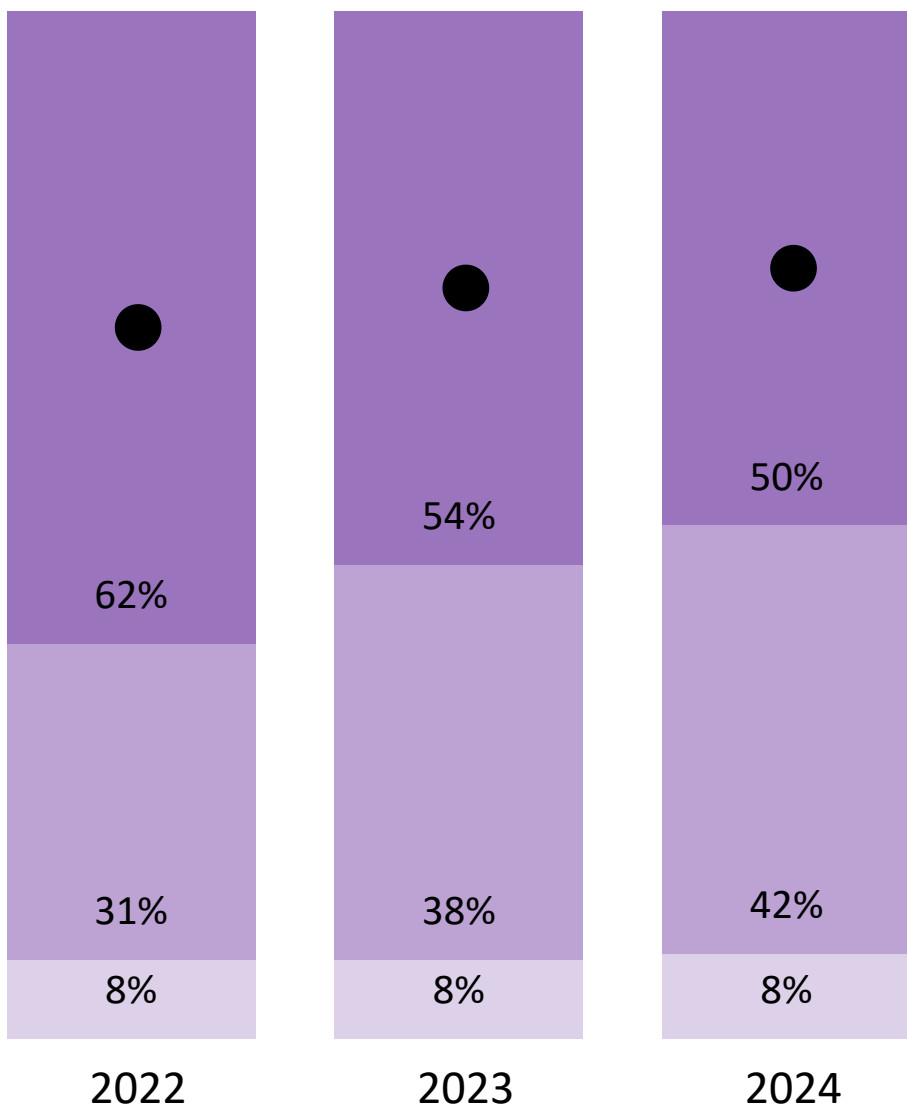
PD5: Reduce the impact of privacy breaches
● Informal ● Foundati... ● Managed ● Your Age...

Year	Managed	Foundational	Informal
2022	54%	38%	
2023	38%	54%	
2024	42%	50%	8%
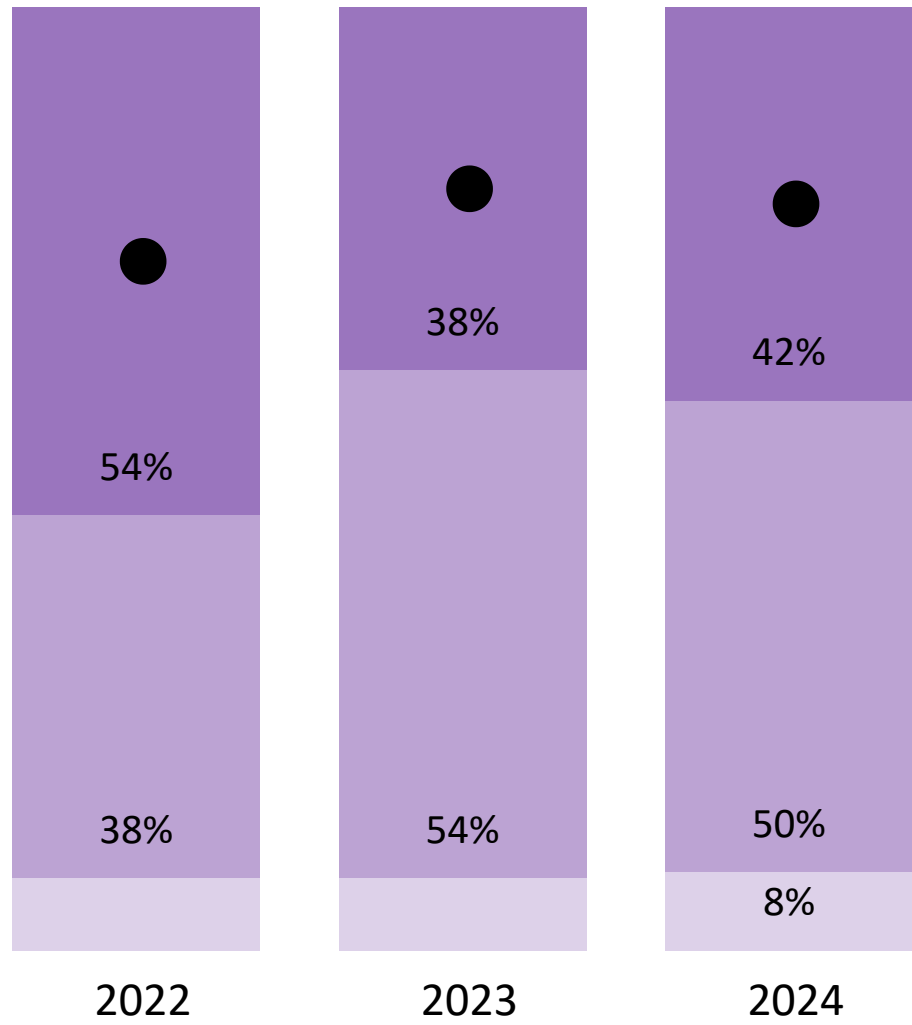
PD6: Enable personal information use, reuse and sharing
● Foundational ● Managed ● Your Agency
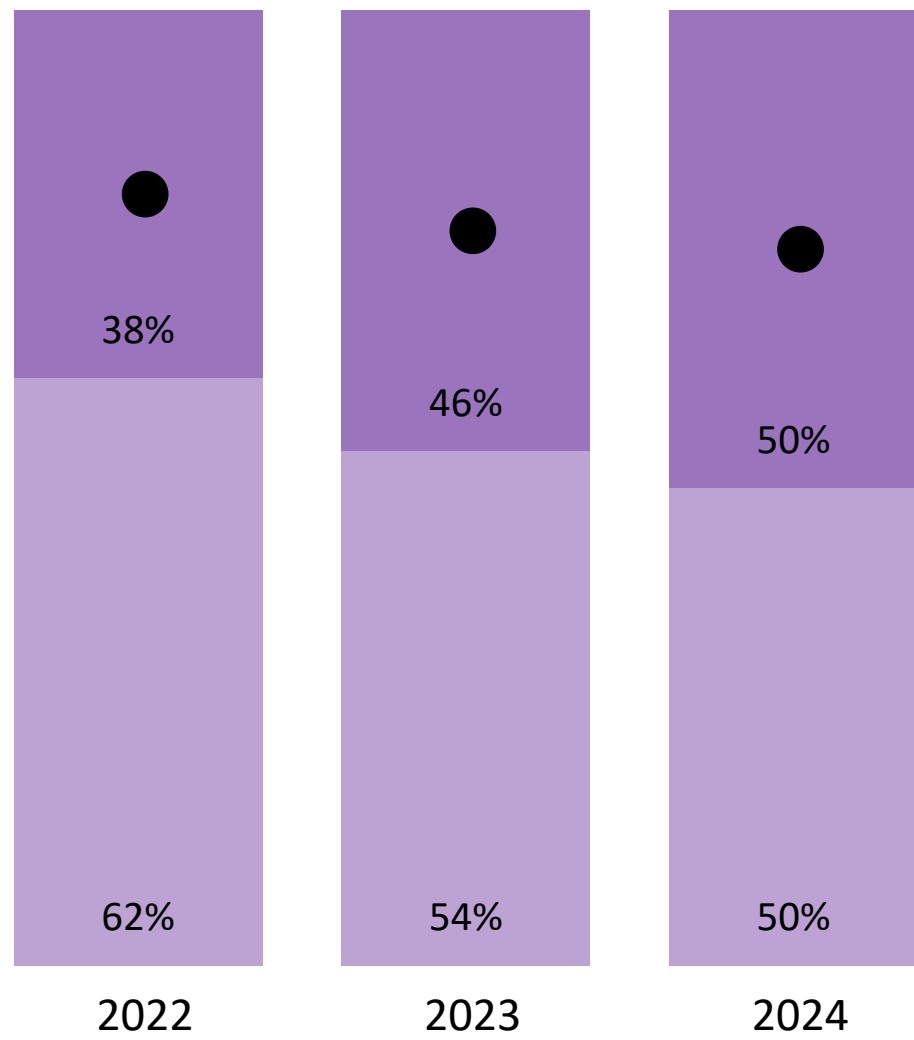
Year	Managed	Foundational
2022	38%	62%
2023	46%	54%
2024	50%	50%

Explanation of category

Category 1: These 13 agencies have large amounts of personal information and/or use personal information for multiple purposes. Category 2: These 34 agencies have small amounts of personal information and/or only use personal information for one purpose.

% criteria at informal

- ● Your Agency
- ■ All agencies in category

CE1: People-centred

● Informal ● Foundatio… ● Managed ● Your Age…

CE5: Capable Treaty partner

● Informal ● Foundatio… ● Managed ● Your Age…

L3: Confidence in organisational progress

● Informal ● Foundatio… ● Managed ● Your Age…
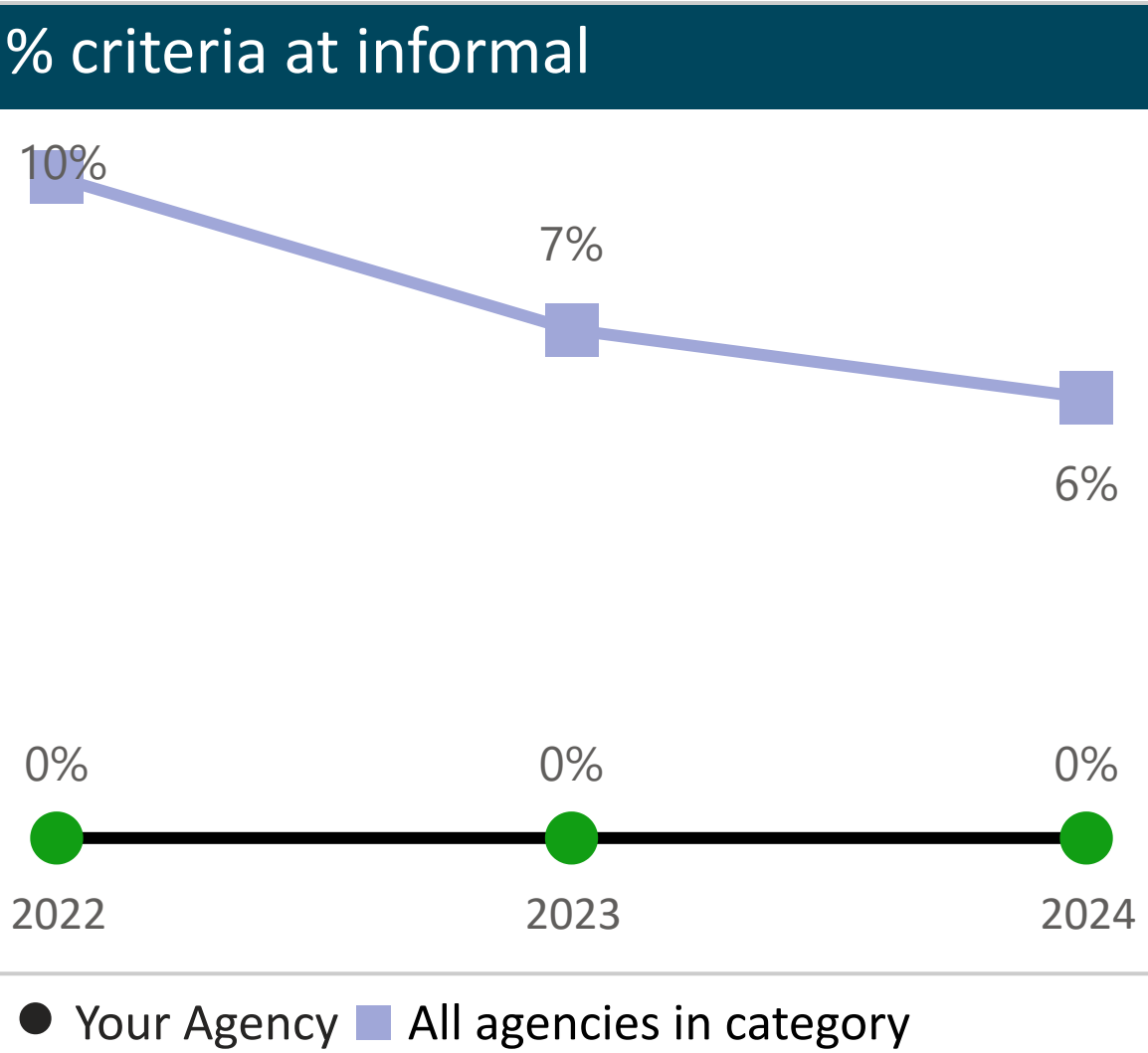
Priority Area: Agencies reduce the number of their Informal maturity ratings by improving maturity in those areas

Agencies have made a concerted effort to reduce their Informal ratings. The number of Informal ratings across all agencies dropped by half from 9% in 2023 to 4.5% in 2024. This is an excellent achievement, and leadership should recognise privacy officers' effort to drive privacy maturity improvement.

Across all agencies, the top three most-improved criteria from Informal to Foundational were identifying Māori privacy interests, reporting privacy work progress to leadership, and having policies and practice on high public interest ways of using personal information, such as Artificial Intelligence and biometrics.

The remaining areas with the largest number of Informal ratings are being a capable Treaty partner, having confidence in organisational progress with privacy risk reporting, and reducing the impact of privacy breaches with retaining information. Two of these were priorities last year and still have several agencies rating Informal. Leaders need to support privacy officers to uplift any remaining Informal criteria in your agency.
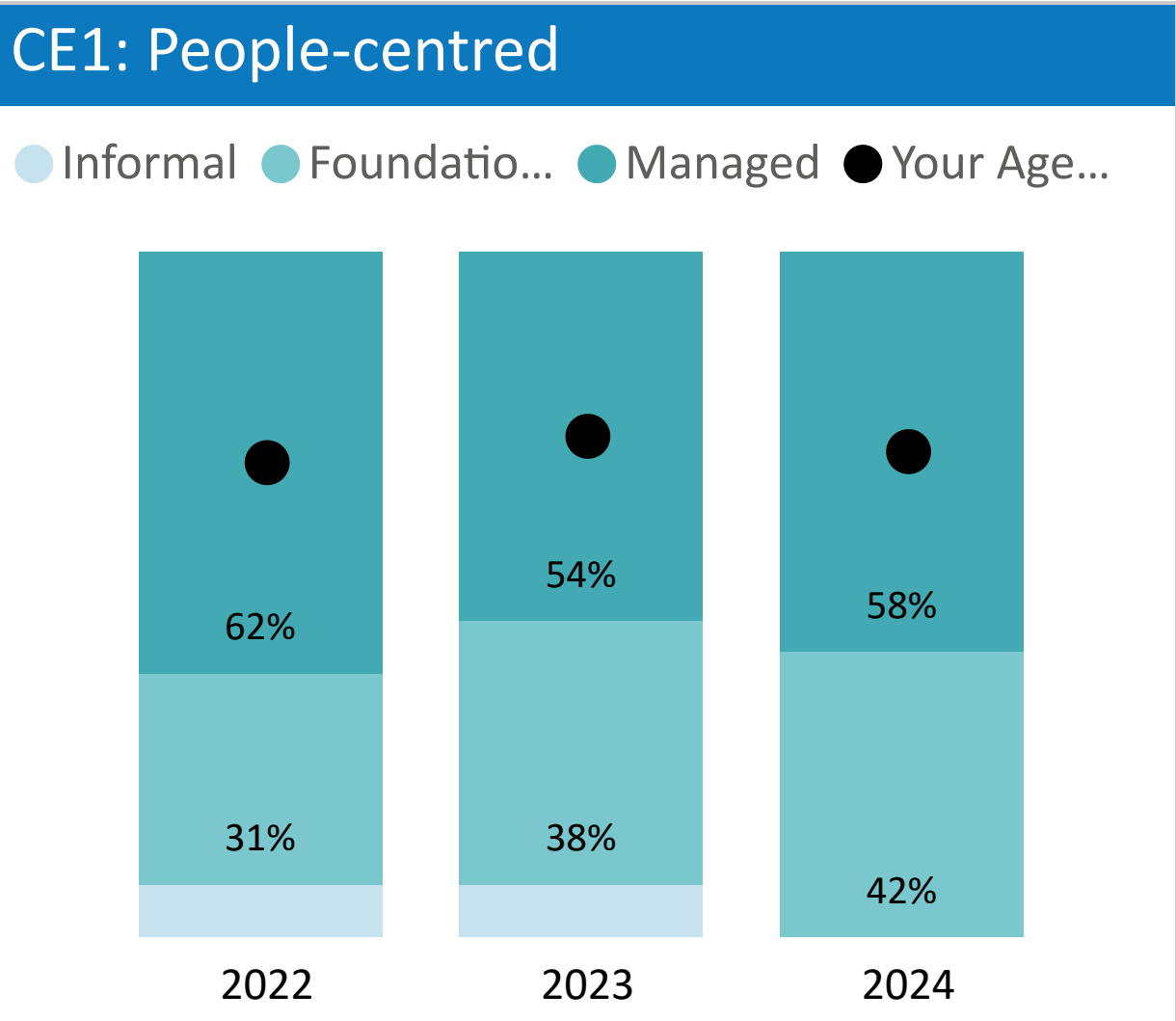
Priority area: Agencies are transparent about their use of personal information and are preparing for new legal requirements for notifying people

Preparation for the Privacy Act Amendment Bill with its new notification requirements was varied. The Bill introduces from June 2025 a new information privacy principle 3A (new IPP3A) to notify individuals about the indirect collection of their personal information. Agencies reported several preparations, including updating privacy statements, creating data inventories identifying indirect collections, and engaging with project leads on new agency initiatives that will collect personal information indirectly.

To do this, privacy officers worked closely with legal teams and operations managers on what the new requirements will look like in practice, provided self-service advice hubs and resources on agency intranets for business units to manage their own updates, and tested new privacy statements with customers for clarity and accessibility. Leadership needs to support privacy officers and raise their profile, along with any IPP3A resources they produce, across your agency's senior managers to ensure your agency's activities comply with the new legal requirements.

Guidance, resources, and templates to help agencies prepare for the upcoming law change is now available in our Privacy guidance on digital.govt.nz
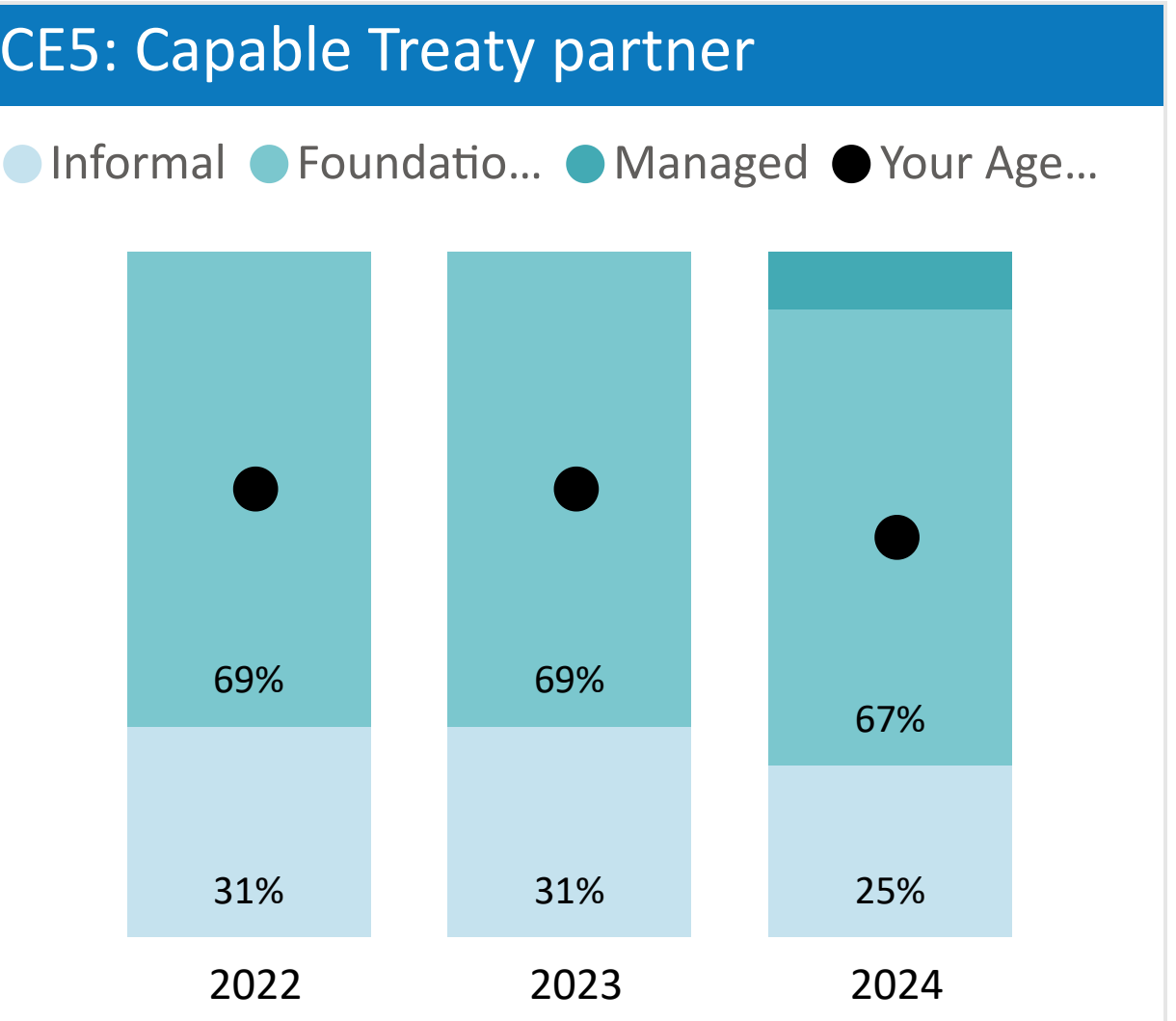
Priority area: Agencies identify Māori interests with the collection and use of personal information and accommodate those interests

Identifying Māori privacy interests was the most improved criterion in 2023-24, with several agencies lifting maturity and investing effort which will bear fruit in future. This area does still have a lot of agencies at Informal. Agencies that did improve maturity have privacy teams closely engaging with Māori advisors, new Māori strategic frameworks launched, and actively partnering with hapu, iwi, providers, and groups who deliver outcomes for Māori.

Specifying what Māori privacy interests are is challenging as these interests are unique for every agency. Agencies can understand what their specific Māori privacy interests are by asking early in Privacy Impact Assessments to identify those interests, even at a high level, and many agencies have begun to do this. What comes out from those answers and discussions can inform meaningful engagement with external Māori partners and providers, creating a positive trust cycle between Māori and your agency, ensuring your agency supports the Crown's relationships with Māori.

New resources are now available. The Government Chief Digital Officer has published He Aratohu Kapua Cloud Te Tiriti Guidance, available from gcdo@dia.govt.nz.

Priority area: Agency leaders manage privacy risk and test risk controls, and maintain policies and processes for high risk use such as generative AI

Agencies focused on improving this criterion with good maturity growth this year, especially among smaller agencies, but this criterion remains the most Informal in the Leadership section. Agencies that improved maturity identified and incorporated privacy into enterprise risk frameworks and added privacy-specific risks to risk registers. Mature agencies have privacy officers working closer with enterprise risk managers, identifying privacy risk owners, and integrating privacy control reviews into internal audit work plans. Some agencies have introduced new tools to track risk control reviews and added new resources to risk and assurance functions.

Executive leaders are responsible for managing privacy risks. As leaders need accurate information to manage privacy risks, privacy officers need time and resources to be proactive about risk. Privacy teams will need to identify and engage with responsible risk owners, review control effectiveness, and report the right metrics you need to know about privacy risk. Privacy teams that are reactive with risk management, focusing on breaches and incidents as they happen, cannot effectively support leaders manage privacy risk.

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Core Expectations

Criterion	Current levels		Agencies above you %		
	Agency maturity 2024	Category Average	2022	2023	2024
CE 1.1 Having a people-centred privacy programme	→ Managed	Managed	0%	0%	0%
CE 1.2 Connecting with service users	→ Foundational	Foundational	38%	31%	33%
CE 1.3 Being transparent	→ Managed	Managed	0%	0%	0%
CE 2.1 Creating a privacy culture	→ Foundational	Foundational	46%	54%	50%
CE 2.2 Communicating privacy values and aspirations	→ Foundational	Foundational	54%	54%	50%
CE 2.3 Developing privacy awareness	→ Foundational	Managed	0%	62%	58%
CE 3.1 Conducting privacy training	↗ Managed	Managed	46%	62%	0%
CE 3.2 Monitoring and updating privacy training	→ Foundational	Managed	38%	38%	58%
CE 3.3 Providing additional privacy training	→ Foundational	Foundational	23%	31%	33%
CE 4.1 Implementing privacy practices	→ Foundational	Foundational	0%	38%	42%
CE 4.2 Linking privacy to organisational values	→ Managed	Managed	0%	0%	0%
CE 4.3 Including privacy in employment	→ Managed	Managed	0%	0%	0%
CE 5.1 Identifying Māori privacy interests	↗ Managed	Foundational	0%	8%	0%
CE 5.2 Partnering with Māori	→ Foundational	Foundational	8%	8%	8%

Note: Arrows indicate change relative to last year

Leadership

Criterion	Current levels		Agencies above you %		
	Agency maturity 2024	Category Average	2022	2023	2024
L 1.1 Privacy reporting	→ Managed	Managed	0%	0%	0%
L 1.2 Privacy and risk management	→ Managed	Foundational	0%	0%	0%
L 2.1 Responsibility and accountability	→ Managed	Foundational	0%	0%	0%
L 2.2 Resourcing	→ Managed	Foundational	0%	0%	0%
L 2.3 Oversight and visibility	→ Managed	Managed	0%	0%	0%
L 3.1 Privacy and assurance	→ Foundational	Foundational	31%	31%	33%

Planning, Policies & Practice

Criterion	Current levels		Agencies above you %		
	Agency maturity 2024	Category Average	2022	2023	2024
PPP 1.1 Privacy planning	→ Foundational	Foundational	46%	54%	50%
PPP 1.2 Planning documents	→ Foundational	Foundational	46%	46%	42%
PPP 1.3 Reporting	→ Managed	Foundational	0%	0%	0%
PPP 2.1 Policies	→ Managed	Foundational	0%	0%	0%
PPP 2.2 Procurement contracts	→ Managed	Foundational	0%	0%	0%

Privacy Domains

Criterion	Current levels		Agencies above you %		
	Agency maturity 2024	Category Average	2022	2023	2024
PD 1.1 Defining the purpose	→ Foundational	Foundational	46%	38%	50%
PD 1.2 Identifying choices	→ Foundational	Foundational	23%	23%	33%
PD 1.3 Reducing personal information	→ Foundational	Foundational	46%	54%	67%
PD 2.1 Implementing Privacy by Design	→ Managed	Managed	0%	0%	0%
PD 2.2 Implementing privacy engineering	→ Managed	Managed	0%	0%	0%
PD 2.3 Responding to high public interest	→ Managed	Foundational	0%	0%	0%
PD 3.1 Having a process	→ Managed	Foundational	0%	0%	0%
PD 3.2 Monitoring the process	→ Managed	Foundational	0%	0%	0%
PD 3.3 Reviewing the process	→ Managed	Foundational	0%	0%	0%
PD 4.1 Knowing agency risks	→ Managed	Foundational	0%	0%	0%
PD 4.2 Managing agency risks	→ Managed	Foundational	0%	0%	0%
PD 4.3 Managing project risks	→ Managed	Managed	0%	0%	0%
PD 5.1 Having a privacy incident register	→ Managed	Foundational	0%	0%	0%
PD 5.2 Minimising collection of personal information	↘ Foundational	Foundational	0%	0%	50%
PD 5.3 Retaining personal information	→ Managed	Foundational	0%	0%	0%
PD 6.1 Having policies for sharing personal information	→ Managed	Managed	0%	0%	0%
PD 6.2 Understanding the use of non-personal information	→ Managed	Foundational	0%	0%	0%