

Service NSW Response to the ICAC Operation Mistral Report

13 July 2021

ICAC Recommendation	SNSW Response	Response Owner	Timing
<p>1. That Service NSW (SNSW) implements a risk-based system designed to improve detection of unauthorised access of personal information. As a minimum, SNSW should use:</p> <ul style="list-style-type: none"> • analytics of access logs across the system to help detect anomalous or other patterns of access that might indicate unauthorised access • routine, formalised auditing of individual DRIVES access logs to help detect where customer service officers' database accesses are unrelated to legitimate transactions. 	<p>SNSW accepts the recommendation and agrees to implement the recommendation as described in ICAC's report subject to the agreement of Transport for NSW (TfNSW).</p> <p>TfNSW owns the DRIVES system which is used by SNSW employees to carry out official functions on behalf of TfNSW.</p> <p>SNSW is working with TfNSW on a course of action to address this recommendation to enable SNSW access to DRIVES access logs so that it can:</p> <ul style="list-style-type: none"> • routinely scrutinise access logs to identify anomalous access patterns occurring in relation to specific transactions and in non-transaction activity, using data analytics • receive real-time alerts to anomalous access patterns to enable immediate/same-day response • further segmentation of access to DRIVES to enable more restricted access to information • routine auditing of customer service officers' activity in DRIVES to detect activity which is unrelated to legitimate transactions, or which occurs contrary to conflict of interest policies 	<p>Risk, Strategy & Performance division</p>	<p>Agreement with TfNSW on course of action: September 2021.</p> <p>Plan of action implemented: December 2021.</p>
<p>2. That SNSW provides clear guidance on the circumstances where managers can consider allowing an employee to perform</p>	<p>SNSW accepts the recommendation and has implemented it as described in ICAC's report.</p> <p>Upon receiving ICAC's draft recommendations in mid-2020, SNSW documented the limited circumstances in which employees are permitted to perform transactions in DRIVES for</p>	<p>Service Delivery division</p>	<p>November 2020 (complete)</p>

<p>transactions in DRIVES for a family member or friend.</p>	<p>themselves, a family member, colleague, or a friend. This is set out in the Accessing SNSW Partnering Agency Systems records for yourself, relatives, colleagues or friends policy of November 2020 and further guidance is provided in the SNSW Family and Friends Register Online Form Knowledge Article of November 2020.</p> <p>This policy and procedure is supported by the annual SNSW Code of Conduct and employee declaration and the Conflicts of Interests policy and employee declaration.</p> <p>An awareness campaign was run across the SNSW frontline network to create awareness of the new online form (see below) and clarify the requirements for using the register, and the circumstances under which employees are permitted to perform transactions in DRIVES for themselves, a family member, colleague or a friend.</p> <p>Feedback from customer service officers and managers is that these updated materials and processes have clarified SNSW's position and made it easier for managers to monitor compliance and follow up any instances of anomalous activity.</p> <p>Additionally, as part of SNSW's response to the NSW Auditor-General's December 2020 performance audit on SNSW's handling of personal information, SNSW has worked with the Department of Customer Service to introduce mandatory privacy training which provides further education on appropriate handling of personal information.</p>		
<p>3. That SNSW establishes a single electronic family and friends register to operate across all service centres to more easily facilitate comparison of information</p>	<p>SNSW accepts the recommendation and has implemented it as described in ICAC's report.</p> <p>Upon receiving ICAC's draft recommendations in mid-2020, SNSW digitised the Family and Friends Register and SNSW has required all entries (including transactions and other interactions) to be made into this</p>	<p>Service Delivery division</p>	<p>November 2020 (complete)</p>

<p>between centres and to help detect:</p> <ul style="list-style-type: none"> • circumstances where customer service officers have acted partially towards family or friends • anomalous or inconsistent recording of transactions involving family and friends across centres. 	<p>electronic register from 2 November 2020. This new online form captures the customer service officer's relationship with the customer, the details of the transaction or interaction and an explanation for why the conflict could not have been avoided. This enables visibility and trend analysis across interactions. Service Centre Managers and the Operational Governance team can view this data which now forms part of the governance process executed by the Operational Governance team.</p>		
<p>4. That NSW identifies which trend and other relevant information from the register should be reported to the Operational Governance Team each quarter by service centre managers to enable a meaningful assessment of whether relevant risks are being managed.</p>	<p>NSW accepts the recommendation and has implemented it as described in ICAC's report.</p> <p>Upon receiving ICAC's draft recommendations in mid-2020, and in line with the action taken by NSW to address recommendations 2 and 3, the NSW Operational Governance team review data from the Family and Friends Online Register, including self-transactions, comparative data by employee and service centre location on entries made to the Family and Friends Register, trends relating to one or more employees processing transactions or accessing systems for the same person and manager approvals of transactions.</p>	<p>Service Delivery division</p>	<p>November 2020 (complete)</p>
<p>Other issues identified in ICAC Report</p>	<p>SNSW Response</p>	<p>Response Owner</p>	<p>Timing</p>
<p>The report highlights the importance of NSW ensuring that employees who are acting as a JP in the exercise of their official functions, perform this role</p>	<p>SNSW has introduced a policy for customer transactions involving employees acting as a JP. This policy requires a different employee to process a transaction from the employee who acted as a JP in relation to the document/s required to evidence</p>	<p>Service Delivery division</p>	<p>Implementation of the new policy: July 2021 (complete).</p> <p>Awareness campaign to support the</p>

<p>with the required standards of honesty and integrity.</p>	<p>the transaction unless there is no practical alternative.</p> <p>This policy also requires that employees do not provide a JP service for themselves, a family member, friend, or colleague, consistent with the NSW Department of Communities and Justice Policy (JP Handbook). In the instance that there is no other JP available, employees may perform this function however they are required to record it and seek their manager's approval via the online Family and Friends register.</p>		<p>new policy: August 2021.</p>
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