

11 December 2023

IR-01-23-36681

s 9(2)(a) OIA

Tēnā koe **s 9(2)(a) OIA**

I am writing to you in response to your Official Information Act 1982 (OIA) request dated 15 November 2023 relating to access to the firearms Registry.

I have responded to each of your questions in turn below.

Question 1: *Are all staff that have any level of access to the registry, vetted and subject to the same background checks as a sworn police officer?*

All Police and Te Tari Pūreke staff with access to the Registry must pass Police vetting processes and can only access it using a Police device while on the Police network. However, Te Tari Pūreke Registry staff are not subject to the same exact range of background checks as sworn police staff, which include, for example, credit, health, and financial checks.

Te Tari Pūreke staff with access to the Registry undertake privacy and security training and are bound by employment conditions and/or contractual agreements related to confidentiality. Police use of the Registry is subject to the same professional conduct standards that apply to any other Police system. Strict protocols are also in place regarding access to the Police network and Police IT systems, and the Registry is no different.

Question 2 *Is any access into the registry and / or firearms holders details within the registry logged and traceable?*

The Arms Information system (AIS) is the overarching system that houses the Registry, MyFirearms and the online payment system for arms. Access and activity within AIS are logged in audit tables, and this includes searches for names and firearms licence numbers, and any activity on completed records.

Access and use of the Registry is audited. Audits include both planned activity and randomised checks to ensure that access and use is appropriate and justified. Access is rigorously audited and where required, action against inappropriate access and use will be taken.

Question 3 *Do registered firearms holders have the ability to receive information and activity reports on access activity and the reason for access of their details within the registry?*



There is no reporting available to regulated parties regarding access of their information. This does not reduce any of the regulated parties' legislative rights to access and audit any personal information held by Police and Te Tari Pūreke.

As your request refers to the overall security of data that is in the Registry, I have also provided background information related to the system security framework which includes the Registry. This might give you more assurance that the security and privacy of licence holders' information is taken very seriously by Te Tari Pūreke – Firearms Safety Authority.

AIS has been assessed using the New Zealand Police Certification and Accreditation Framework, which provides a formal process and structure for a risk-based approach to the security and resilience of systems that process government and personal information.

All public service departments, including Te Tari Pūreke, must implement the Protective Security Requirements (PSR). The PSR outlines the Government's expectations for managing staff and physical and information security. The AIS and the Registry have been through multiple security assessments by Government-approved independent security consultants. These assessments examine how the system was designed and implemented to ensure it complies with New Zealand Government security and privacy requirements, including the New Zealand Information Security Manual, PSR, and industry best practice.

The AIS and the Registry are classified to recognise the potential national security impacts of unauthorised release or access to information held in the Registry. The Registry therefore has strong protections to safeguard the information from unauthorised access. This means Te Tari Pūreke has implemented a range of security controls to help protect the confidentiality and integrity of the information held in the Registry.

These security controls include:

- strong data encryption of all information stored in the Registry,
- robust authentication, including two-factor authentication,
- limits on what data can be accessed by staff in different roles, and what can be accessed via MyFirearms, and
- maintaining records of what actions are taken in the system, both by Police staff and users of MyFirearms, and processes to review these records for suspicious or unusual activity.

For your information, Police has developed a process for proactive release of information, so the anonymised response to your request may be publicly released on the New Zealand Police website.

Nāku noa, nā



Richard Wilson
Superintendent
Director Operations
Firearms Safety Authority