

REVIEW OF STATUTORY AUTHORITIES FOR INFORMATION MATCHING

Unused matching provisions

Report by the Privacy Commissioner to the Minister of Justice pursuant to section 106 of the Privacy Act 1993 in relation to a review of **unused** information matching provisions

Accident Compensation Act 2001: sections 280 and 343 (preserving sections 370 and 371 of the Accident Insurance Act 1998)

Births, Deaths, Marriages, and Relationships Registration Act 1995: sections 78A and 78B

Citizenship Act 1977: section 26A

Corrections Act 2004: section 182

Customs and Excise Act 1996: section 280L

Housing Restructuring and Tenancy Matters Act 1992: section 68

Immigration Act 2009: sections 298 and 299

Social Security Act 1964: sections 11A and 126AB

Tax Administration Act 1994: sections 46A and 85H

Executive summary

This paper reports on my review of unused information matching provisions

This paper reports on my review of unused information matching provisions made under the Privacy Act 1993 (the Act). Information matching provisions authorise specified agencies to use information matching to deliver public benefits. These provisions override the Act's information privacy principles.

Section 106 of the Act requires me to periodically review information matching provisions to ensure any intrusion on individuals' privacy remains justified. I report my findings to the Minister of Justice, who must table a copy of my report in the House of Representatives.

My Office has identified 22 information matching provisions that are not being used by agencies, and has consulted agencies on whether they plan to use them. These provisions have never been used, or have not been used for several years.

I recommend that unused provisions are not continued

Unused provisions do not deliver their intended benefits to society and continuing Parliamentary authorisation of these privacy intrusive measures is unjustified.

I recommend that where agencies are not using a provision and have no active plans to do so, the provision is not continued. This recommendation applies to most of the provisions I have reviewed. The review has prompted agencies to actively consider setting up information matching programmes under three provisions, and I have no comment to make on continuing these provisions, pending agencies implementing information matching.

My report shows that Parliament has needlessly enacted many provisions overriding the information privacy principles. These examples underscore the importance of a rigorous and disciplined policy process. Given the considerable resources involved in enacting provisions (see Box 2), Parliament should expect officials to have conducted full due diligence to support future claims that privacy overrides are necessary to achieve public policy objectives.

Introduction

1. This paper reports on my review of unused information matching provisions. Information matching provisions are statutory provisions that authorise specified agencies to carry out information matching under part 10 of the Act to provide benefits to the public.
2. Agencies' information matching overrides the Act's information privacy principles. Section 106 of the Act requires me to periodically review information matching provisions to ensure any intrusion on individuals' privacy remains justified.
3. There are 22 information matching provisions that are not being used by agencies. This raises a number of concerns for me. Unused provisions do not deliver their intended benefits to society and continuing Parliamentary authorisation of these privacy intrusive measures is unjustified.
4. My report shows that Parliament has needlessly enacted many provisions overriding the information privacy principles. These examples underscore the importance of a rigorous and disciplined policy process. Given the considerable resources involved in enacting provisions (see Box 2), Parliament should expect officials to have conducted full due diligence to support future claims that privacy overrides are necessary to achieve public policy objectives.

Box 1: What is information matching?

Agencies specified under section 97 of the Act conduct information matching when they compare one set of data about individuals with another set. They usually do this to find records in both sets that are about the same person. Government agencies use information matching to help them provide benefits to society. For example, agencies often use information matching to make sure people get their correct entitlements, or to detect fraud.

For the purposes of the Act, an information matching programme involves two specified agencies comparing at least two documents that each contain personal information about ten or more individuals, to produce or verify information that may be used for the purpose of taking adverse action (e.g. altering a payment, or investigating an offence) against an identifiable individual.

Box 2: Steps that take place for Parliament to authorise information matching:

- A department prepares advice for their portfolio Minister on an information sharing issue
- The Minister agrees to a policy proposal and seeks decisions from Cabinet
- Cabinet ministers consider the policy proposal and agree to progress it
- Parliamentary Counsel prepares draft legislation as part of a draft Bill
- The Privacy Commissioner examines proposed information matching provisions under section 13(f) of the Act and reports to the Minister on whether the potential public interest in matching justifies the legislative intrusion into privacy
- Cabinet agrees to introduce a draft Bill into the House of Representatives
- The Minister introduces the Bill to the House, members of Parliament read and debate it
- Parliament refers the Bill to a select committee, who consider public submissions
- The select committee receives public submissions, deliberates and reports their recommendations to Parliament
- Parliament debates the Bill further and ultimately enacts it into law.

Information matching overrides information privacy principles

5. Information matching provisions override individuals' rights and protections under the information privacy principles, and authorise the following:
- Agencies collect information about an individual from another agency's dataset. By contrast, principle 2 of the Act requires an agency to collect personal information from the individual concerned.
 - Agencies use and disclose information from datasets that were collected for own particular purposes for other, new purposes. By contrast, principles 10 and 11 generally require an agency to use and disclose information within the purposes for which it was collected.
 - Agencies sometimes use and disclose individuals' information for purposes that were not known to the individual when their information was originally collected. By contrast, principle 3 of the Act requires an agency to take reasonable steps to inform an individual about how their information will be used and disclosed.

The Privacy Act regulates information matching to mitigate its privacy impact

6. My reviews of information matching provisions form part of the Act's regulation of agencies' information matching programmes. Controls on information matching provisions mitigate their privacy impact and promote transparency and public trust in government. The Act promotes information matching Parliament authorising information matching only when it is clearly justified in the public interest. Agencies' programmes must operate within the Act's information matching framework.

Box 3: The Act's information matching framework

Information matching provisions are set out in schedule 3 to the Act. They authorise agencies to disclose "authorised information matching information", which agencies may then compare with other personal information.

The Privacy Commissioner examines proposed information matching provisions under section 13(f) of the Act and reports to the responsible Minister on whether the potential public interest in matching justifies the legislative intrusion into privacy.

To implement a provision, agencies operate an "authorised information matching programme". The programme is subject to the controls in sections 99 to 106 of the Act, and the information matching rules in schedule 4 to the Act. Agencies must enter into an information matching agreement that reflects the information matching rules in schedule 4.

Approach to review

7. Section 106 of the Act requires me to review the operation of every information matching provision at least every five years. I need to consider whether the statutory authority should continue; and if so, whether any amendments should be made to it.
8. I report my findings to the Minister of Justice, who must table a copy of my report in the House of Representatives.

This report reviews the ongoing justification for information matching provisions that agencies are not using

9. This review covers information matching provisions agencies are not using – where there is no information matching programme in place. In reviewing these provisions I have taken into account the information matching guidelines found in section 98 of the Act, to which I am required to have regard when examining proposed information matching legislation.
10. For unused provisions, it is particularly relevant to ask:
 - whether a provision is achieving its objective by providing significant monetary benefits or other comparable benefits to society; and
 - whether or not the public interest in allowing the provision continues to outweigh the public interest in adhering to the information privacy principles it would otherwise contravene.
11. If an agency is not using a provision and does not demonstrate any active plans to do so, the provision is not achieving its objective by providing any benefits to society. The public interest in allowing such a provision cannot justify its authorisation to contravene the information privacy principles.

My Office identified unused provisions and consulted agencies

12. My Office identified 22 provisions for which there is no information matching agreement in place. We then asked the agencies we would expect to lead the implementation of information matching under these provisions:
 - if they were using the provision
 - if they have any plans to use the provision
 - if they had any plans to modify or remove the provision
 - if there was any reason to keep the provision.
13. I assessed the provisions and agencies' responses and took into account the information matching guidelines above. Detail on the provisions and agencies' responses are summarised in the Appendix.

Commissioner's findings and recommendations

14. I have found that agencies have no active plans to use the majority of the unused information matching provisions I have reviewed. Many of these provisions were never used after Parliament enacted them. Agencies used some provisions for a limited period before abandoning them. This review has prompted agencies to actively consider setting up information matching programmes under three provisions.

I recommend the following provisions are not continued:

15. Agencies have no active plans to use the following provisions for information matching. I recommend they are not continued:

- sections 370 and 371 of the Accident Insurance Act 1998
- section 78B of the Births, Deaths, Marriages, and Relationships Registration Act 1995
- section 280L of the Customs and Excise Act 1996
- section 68 of the Housing Restructuring and Tenancy Matters Act 1992
- section 298 of the Immigration Act 2009
- sections 11A and 126AB of the Social Security Act 1964¹
- sections 46A and 85H of the Tax Administration Act 1994

- under section 78A of the Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A, provisions:
 - for the Accident Compensation Corporation to receive various information to verify claimants' details and eligibility and to identify deceased claimants
 - for the Department of Internal Affairs to receive death information to identify deceased holders of New Zealand travel documents
 - for the Ministry of Education to receive various information to verify and update the National Student Index

- under section 26A of the Citizenship Act 1977 and schedule 4, to provide citizenship information to:
 - Inland Revenue
 - Ministry of Education
 - Ministry of Social Development.

I recommend the following provisions are amended:

16. The Accident Compensation Corporation (ACC) is only partially using section 280 of the Accident Compensation Act 2001. This provision should be amended to limit its scope to ACC conducting information matching with the Department of Corrections.

¹ The Social Security Legislation Rewrite Bill, currently before the House, carries over the provisions currently provided by sections 11A and 126AB of the Social Security Act 1964

17. Section 182 of the Corrections Act should be continued, but removed as an information matching provision. The Department of Corrections is sharing information with Police under this provision, but this activity does not constitute information matching. My recommendation will be addressed by the Privacy Bill as it removes section 182 from the schedule of information matching provisions.

I make no comment where agencies advise they may implement unused provisions:

18. Agencies have told my Office they are actively investigating using or partially using some currently unused provisions, including:

- section 299 of the Immigration Act 2009
- section 78A of the Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A², in relation to:
 - the Ministry of Justice receiving death information to finalise fines on death, and name change information to verify fine defaulters' name changes
 - the New Zealand Transport Agency receiving various information to verify details supplied by an applicant for a driver's licence, and the name change of a holder of a driver's licence
 - the Ministry of Business, Innovation and Employment receiving various information for immigration purposes.

19. I have no comment to make on continuing these provisions, pending agencies implementing information matching. I note that the Privacy Bill will require agencies to implement any new programmes under these provisions before 1 July 2019.

² The Births, Deaths, Marriages and Relationships Registration Bill, currently before the House, carries over the provisions currently provided by section 78A and 78B of the Births, Deaths, Marriages and Relationships Registration Act 1995.

Appendix: detailed review of provisions

Provisions and recommendations are organised by the agency we would expect to lead the implementation of information matching

Accident Compensation Corporation

AUTHORISING PROVISIONS REVIEWED

Section 280 Accident Compensation Act 2001
Sections 370 and 371 Accident Insurance Act 1998
Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 280 Accident Compensation Act 2001

The purpose of this section is to allow various specified agencies to disclose information to the Accident Compensation Corporation (ACC) to assist ACC to verify payment entitlement and eligibility.

ACC operates an information match with the Department of Corrections (Corrections). ACC has not used this provision to obtain information from any other agencies.

Sections 370 and 371 Accident Insurance Act 1998

Sections 370 and 371 are historical provisions saved by the current Accident Compensation Act for transitional purposes. They provide for ACC to obtain employer information from Inland Revenue to facilitate administration and enforcement of the previous accident insurance regime. The agencies implemented and used these provisions over 1999-2000, but they have not been used since.

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 78A was inserted into the Births, Deaths, Marriages and Relationships Registration Act 1995 in 2001. It allows the Department of Internal Affairs (DIA) to share information in various ways specified in schedule 1A. ACC's entries provide for ACC to receive births, deaths and marriage information to verify the identity of a claimant, their eligibility, any change of name and to identify deceased claimants. DIA and ACC have not used this provision.

Agency views

In response to this review, ACC has not advised my Office of any plans to use section 280 of the Accident Compensation Act to obtain information from any agencies besides Corrections.

ACC has advised it does not plan to use sections 370 and 371 of the Accident Insurance Act for information matching. There is limited use for these provisions as only small volumes of people are still captured by the old regime.

ACC advised that matching under section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 never eventuated, and has not advised of plans to use this provision.

Recommendations

I recommend section 280 of the Accident Compensation Act is amended to restrict its scope to ACC obtaining information from Corrections. I recommend sections 370 and 371 of the Accident Insurance Act 1998 and ACC's provision under schedule 1A to the Births, Deaths, Marriages, and Relationships Registration Act 1995 are not continued.

Department of Corrections

AUTHORISING PROVISION REVIEWED

Section 182 Corrections Act 2004

Section 182 Corrections Act 2004

Section 182 of the Corrections Act allows the Department of Corrections (Corrections) to disclose offender information to New Zealand Police to facilitate monitoring of persons on temporary release.

Corrections have not implemented an information matching programme under this provision. As part of my review my Office found that Corrections are using this provision to share information with Police under a Memorandum of Understanding. Each time a person is temporarily released, Corrections sends information about their release to Police.

I do not consider the agencies' activity constitutes information matching for the purposes of the Privacy Act. The agencies are sharing information on an individual basis, for the purpose of notifying Police. Police are not a specified agency under Part 10 of the Act.

I note further that section 182 may be an unnecessary override and this activity may well be permitted under the information privacy principles. Principle 11(a) of the Act allows an agency to disclose personal information for a purpose in connection with which the information was obtained. Monitoring the conditions attached to a person's temporary release is connected to the purpose of issuing those conditions. In addition, principle 11(e)(i) of the Act allows an agency to disclose personal information if it reasonably believes this is necessary to avoid prejudice to the maintenance of the law.

Agency views

In response to this review, Corrections advised they rely on this provision to share information with Police and therefore wish to retain it.

Recommendation

I recommend section 182 of the Corrections Act is removed as an information matching provision under the Privacy Act. My recommendation will be addressed by the Privacy Bill as it removes section 182 from the schedule of information matching provisions.

Department of Internal Affairs

AUTHORISING PROVISIONS REVIEWED

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 78B Births, Deaths, Marriages, and Relationships Registration Act 1995

Section 126AB Social Security Act 1964³

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 78A allows the Department of Internal Affairs (DIA) to share information in various ways specified in schedule 1A. One entry provides for DIA to use death information it holds internally to identify New Zealand travel document holders who are deceased.

Parliament entered this provision into the schedule in 2013 and DIA has not used it. DIA is currently seeking an Approved Information Sharing Agreement (AISA) that would allow for this use of information.

Births, Deaths, Marriages, and Relationships Registration Act 1995 Section 78B and

Section 126AB of the Social Security Act 1964

These provisions are complementary. Parliament inserted them their respective legislation in 2009 to allow the Ministry for Social Development (MSD) to disclose information to DIA so that DIA could trace and contact mothers of children whose births have not been registered. The agencies have not used these provisions for information matching.

Agency views

DIA advised it does not have any intention of implementing these information matching provisions. DIA is currently engaged in a substantial transformation programme that will replace existing information matching agreements with one or more AISAs under Part 9A of the Privacy Act 1993. As part of this work they are considering circumstances where a provision for sharing information exists but has not been used to date.

Recommendation

I recommend Section 126AB of the Social Security Act, Section 78B of the Births, Deaths, Marriages, and Relationships Registration Act and DIA's provision under schedule 1A to that Act are not continued.

³ The Social Security Bill, currently awaiting its third reading, carries this provision over in schedule 6 to the Bill
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Inland Revenue

AUTHORISING PROVISIONS REVIEWED

Sections 46A Tax Administration Act 1994

Section 26A Citizenship Act 1977 and schedule 4

Section 280L⁴ Customs and Excise Act 1996

Section 46A Tax Administration Act 1994

This provision allows ACC to share information about recipients of weekly compensation with Inland Revenue (IR), to assist IR to verify entitlements to the child tax credit.

IR has not used this provision for information matching. Parliament repealed the child tax credit from 2012. It can still be claimed by taxpayers who qualified in the years prior.

Section 26A Citizenship Act and schedule 4

This provision allows DIA to disclose citizenship information to a number of agencies specified in schedule 4. One entry provides for IR to receive citizenship information for the purpose of verifying identity. IR has not used this provision.

Section 280L Customs and Excise Act 1996

Section 280L provides IR with direct access to arrival and departure information for child support purposes. IR has not used this provision.

Agency views

In response to this review, IR advised my Office that section 46A of the Tax Administration Act may be required for information sharing in small volumes while the child tax credit still exists for those taxpayers who qualify. However IR has not advised of any plans to implement an information matching programme.

IR has advised my Office it does not have plans to use its provision under section 26A of the Citizenship Act, but suggests it is retained in the short term.

IR has advised it has no plans to use section 280L of the Customs and Excise Act.

Recommendations

I recommend section 46A of the Tax Administration Act is not continued as an information matching provision under the Privacy Act. I note that IR may wish to retain the substantive provision to support ACC sharing (rather than matching) information while some taxpayers are still entitled to the child tax credit.

I recommend IR's provisions under section 280L of the Customs and Excise Act and section 26A of the Citizenship Act are not continued.

⁴ From 1 October 2018, section 280L Customs and Excise Act 1996 is replaced by section 313 Customs and Excise Act 2018

Ministry of Business, Innovation and Employment

AUTHORISING PROVISIONS REVIEWED

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 299 Immigration Act 2009

Section 85H Tax Administration Act 1994

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995

Section 78A allows the Department of Internal Affairs to share information in various ways specified in schedule 1A, including providing the Ministry of Business, Innovation and Employment (MBIE)⁵ with:

- Birth and name change information, to verify a person's citizenship status or entitlement to reside in New Zealand, and to update and verify immigration records.
- Relationship and name change information, to verify marriage or civil union of a person to a New Zealand citizen.
- Death information, to identify deceased holders of temporary entry class visas.

MBIE has only used this provision to obtain death information.

Section 299 Immigration Act 2009

This provision allows MBIE to obtain information from the Ministry of Social Development (MSD) to recover the costs of visa holders' social security benefits from their sponsors. MBIE has not used this provision.

Section 85H Tax Administration Act 1994

Section 85H provides for Inland Revenue to disclose information to MBIE so that MBIE can verify entitlements, and check for overpayments, of parental or preterm baby payments. The agencies have not used this provision.

Agency views

In response to this review MBIE advised it wants to retain its provisions under schedule 1A and is now investigating implementing a programme for name change information. MBIE is also investigating using section 299 of the Immigration Act.

MBIE would prefer to retain section 85H of the Tax Administration Act but has not advised my Office of any active plans to use it.

Recommendations

I recommend section 85H of the Tax Administration Act is not continued.

I have no comment to make on MBIE's provisions under schedule 1A to the Births, Deaths, Marriages, and Relationships Registration Act 1995 and section 299 of the Immigration Act, pending MBIE's plans to implement information matching. I note that the Privacy Bill will require agencies to implement any new programmes under these provisions before 1 July 2019.

⁵ Note MBIE is listed as "Department of Labour" in schedule 1A.

Ministry of Education

AUTHORISING PROVISIONS REVIEWED

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 26A and schedule 4 Citizenship Act 1977

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 78A allows the Department of Internal Affairs (DIA) to share information in various ways specified in schedule 1A. One entry provides for the Ministry of Education (MoE) to obtain birth, relationship, name change and death information to verify and update the National Student Index.

The agencies have only used this provision for one short period, from 2004 to 2005 for data cleansing exercise.

Section 26A Citizenship Act and schedule 4

Section 26A allows DIA to share citizenship information in various ways specified in schedule 4. One entry allows MoE to receive citizenship information to verify and update student information on the National Student Index. MoE has not used this provision.

Agency views

In response to this review, MoE advised that while it does not have active plans to implement a programme, it wants to retain the provision under schedule 1A to the Births, Deaths, Marriages, and Relationships Registration Act for potential future use.

MoE advised it has no plans to use the provision under section 26A of the Citizenship Act.

Recommendation

I recommend MoE's provisions under schedule 1A to the Births, Deaths, Marriages, and Relationships Registration Act and schedule 4 to the Citizenship Act are not continued.

Ministry of Justice

AUTHORISING PROVISIONS REVIEWED

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 78A allows the Department of Internal Affairs to share information in various ways specified in schedule 1A, including for the Ministry of Justice (MoJ) to:

- obtain marriage and civil union information to verify a fine defaulter's name change
- obtain death information to assist with finalising fines on a person's death
- obtain death information to assist the Māori Land Court to identify deceased Māori land owners
- obtain death information to remove deceased persons from jury lists.

With the exception of the entry to assist the Māori Land Court to identify deceased Māori land owners, MoJ has not used this provision. MoJ used the Māori Land Court entry briefly over 2007 and 2008 and has not used it since.

Agency views

In response to this review, MoJ is now considering implementing information matching to verify fine defaulters' name changes and to finalise fines on death.

MoJ advised it has no plans to re-activate information matching to identify deceased Māori landowners, and noted any decision would involve the Judiciary. Similarly, MoJ advised it has no plans to use schedule 1A to update juror lists. MoJ obtains relevant information from the Electoral Commission.

Recommendations

I have no comment to make on continuing MoJ's provisions to obtain information under schedule 1A to the Births, Deaths, Marriages, and Relationships Registration Act 1995, pending their plans to implement further information matching. I note that the Privacy Bill will require agencies to implement any new programmes before 1 July 2019.

Ministry of Social Development

AUTHORISING PROVISIONS REVIEWED

Section 26A Citizenship Act 1977 and schedule 4

Section 298 Immigration Act 2009

Section 68 Housing Restructuring and Tenancy Matters Act 1992

Section 11A Social Security Act 1964⁶⁷

Section 26A Citizenship Act 1977 and schedule 4

This provision allows the Department of Internal Affairs to supply citizenship information to the Ministry of Social Development (MSD) to assist MSD to verify eligibility for benefits, war pensions, grants, loans, allowances or their eligibility for a community services card. MSD has not used this provision.

Section 298 Immigration Act 2009

This provision allows MSD and Immigration New Zealand (within the Ministry of Business, Innovation and Employment) to share information to verify entitlements. MSD has not used this provision.

Section 68 Housing Restructuring and Tenancy Matters Act 1992

This provision allows the Housing New Zealand Corporation (Housing NZ) to disclose tenancy information to MSD to verify eligibility for and amounts of benefits and entitlements, and to recover debts to the Crown. The agencies implemented information matching from 2006 to August 2014, when responsibility for administering income-related rents transferred from Housing NZ to MSD.

Section 11A Social Security Act 1964

This provision allows MSD to obtain bulk employee information from employers to verify entitlements. MSD used this provision between 1993 and 2008, and has not used it since.

Agency views

MSD has not advised my Office of any plans to use any of these provisions. Regarding section 298 of the Immigration Act, MSD advises it does not require matching with Immigration because it requires applicants to provide residence information directly before granting a benefit.

Recommendation

I recommend MSD's provisions under schedule 4 to the Citizenship Act, section 298 of the Immigration Act, section 68 of the Housing Restructuring and Tenancy Matters Act, and Section 11A of the Social Security Act are not continued.

⁶ Section 11A is not an authorised information matching provision under schedule 3 to the Privacy Act. However, the Social Security Act subjects information matching under this provision to the information matching controls in Part 10 of the Privacy Act, so it is appropriate it forms part of this review.

⁷ The Social Security Bill, currently awaiting its third reading, carries this provision over in schedule 6 to the Bill

New Zealand Transport Authority

AUTHORISING PROVISION REVIEWED

Section 78A Births, Deaths, Marriages, and Relationships Registration Act 1995 and schedule 1A

Section 78A and schedule 1A Births, Deaths, Marriages, and Relationships Registration Act 1995

This provision allows the New Zealand Transport Agency (NZTA) to receive birth, name change and marriage information to verify driver licence details, and death information to identify deceased licence holders.

NZTA has been using this provision since 2008 to receive death information from the Department of Internal Affairs. It has not used the provision to receive any other classes of information.

Agency views

In response to this review, NZTA advises it is investigating using other classes of information, including facilitating asking driver licence holders who are changing their name whether they also want to change their name on their driver licence.

Recommendation

I have no comment to make on continuing NZTA's provision under schedule 1A to the Births, Deaths, Marriages, and Relationships Registration Act 1995, pending NZTA's plans to implement further information matching. I note that the Privacy Bill will require agencies to implement any new programmes under these provisions before 1 July 2019.