

Privacy Foundation NZ

Ministry of Social Development

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Tēnā koutou

Submission on proposed AISA Amendment

The Privacy Foundation New Zealand welcomes the opportunity to comment on the proposed amendment to the MSD/IRD Approved Information Sharing Agreement (the **AISA**) to support the Child Support Pass-on initiative. We wish to point to certain aspects we believe need further elaboration or explanation.

The Privacy Foundation's View

We have examined the proposed amendments to the MSD/IRD AISA and the accompanying Privacy Impact Assessment (the **PIA**), and make the following points:

- The key issue here is about data accuracy, and the ability of MSD clients to dispute inaccuracies **before** an adverse adjustment is made.
- On balance, the PIA gives a good amount of detail on the dispute and escalation processes that will be enhanced in light of the removal of the notice period.
- However, the PIA is underdeveloped regarding MSD's internal processes for identifying data inaccuracies; there is very little detail on this. It simply specifies that there are internal processes for monitoring data matching and specifies that a match will be made on 3 out of 5 attributes (including IRD number). The PIA should incorporate detail on how the 99% accuracy rate has been identified and validated (i.e. is there existing evidence to support this baseline?), the period to which that accuracy rate applies, and the process for identifying if that accuracy rate drops.
- The PIA is silent on post go-live reviews; for example, what is the timeframe
 - A. for reviewing the volume increase in disputes or escalation processes?
 - B. Reviewing the data matching process and checking that the accuracy rate is still as high as MSD believes it is?
 - C. Reviewing volume in increase in non-recoverable hardship payments based on the client stating that their benefit payment is incorrect?

Inclusion of a post go-live review would round out this PIA.

This submission was compiled by members of the Foundation's Working Group on Legislation and Regulatory Reform whose convenor is Louisa Joblin. **Contact:** info@privacyfoundation.nz

Best wishes,



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