

**Authorisation by the Privacy Commissioner
pursuant to section 54(1)(b) of the Privacy Act 1993**

Pursuant to section 54(1)(b) of the Privacy Act 1993, I, **John Edwards**, Privacy Commissioner, authorise a data match as set out in the Appendix to identify Ministry of Social Development (MSD) clients eligible for a debt write off or refund for recoverable assistance paid to Housing NZ clients who were evicted from rental housing under Housing NZ's former methamphetamine contamination policy.

The data match involves the collection and disclosure of personal information that would otherwise be in breach of information privacy principles 2 and 11 of the Privacy Act.

This authorisation is given on the following conditions:

- i. The data match is limited to a one-off exercise (to be completed in two stages), to be completed by [*date that is 6 months from authorisation*].
- ii. Data points 4-7 may only be disclosed following an initial successful match in MSD systems of data points 1-3.
- iii. Any individual whose tenancy was ended or terminated by Housing NZ for criminal activity relating to methamphetamine will be excluded from the data match.
- iv. The data points disclosed by Housing NZ will be used solely for purposes of the data match.
- v. The results of the data match may only be used to contact and verify the eligibility of people within the target group to receive debt write offs or refunds of recoverable assistance sought as a result of their tenancy ending or having their tenancy terminated under Housing NZ's methamphetamine contamination policy.
- vi. The information provided by Housing NZ will be provided by encrypted iron key and password protected, and stored securely by MSD in a separate folder with restricted access.
- vii. All information disclosed under this authorisation will be destroyed following completion of the data match in reliance on General Disposal Authority GDA 7.
- viii. MSD will keep a record of any action taken as a result of the data match.
- ix. MSD will carry out manual checks to ensure accuracy of the data match results before contacting affected individuals.
- x. If a privacy complaint is received, the receiving agency will consult with the other agency as to the appropriate actions. The agencies will decide which one will take

responsibility for managing the complaint as well as acting as the primary point of contact for the complainant. The complainant will be notified of this decision.

- xi. Any data breaches, by either HNZ or MSD, relating to personal information disclosed as a result of this authorisation must be reported to the Office of the Privacy Commissioner.
- xii. MSD and HNZ will jointly report on the results of the data match to the Office of the Privacy Commissioner within six months of the date of this authorisation.
- xiii. MSD and Housing NZ will publish a description of the data match on their websites, including the terms of this approval and ensure these remain publicly available for 12 months from the date the data match is completed.
- xiv. MSD will provide a facility for responding to any public inquiries about the data match, details of which must be available on MSD's website.
- xv. The Privacy Commissioner will publish this authorisation including its conditions on the website of the Office of the Privacy Commissioner. The granting of the authorisation will also be included in the Privacy Commissioner's Annual Report.

Dated this 17th day of September 2019



John Edwards,
Privacy Commissioner

Appendix

Data matching process

The data match is to be carried out in two stages.

First, Housing NZ will disclose to MSD data points 1-4 below in respect of all main tenants, additional signatories and other occupants of Housing NZ properties affected by the methamphetamine contamination policy between 1 June 2013 and 1 July 2018.

MSD will then match that information against its own client records and return the successful match information to Housing NZ.

Secondly, Housing NZ will provide data points 5-7 below in respect of individuals identified by the data match.

The relevant data points are the following:

1. MSD client number (if known)
2. Name
3. Date of birth
4. HNZ reference number
5. HNZ property address
6. Date of positive meth test
7. Date tenancy ended