

8 March 2022

133 Molesworth Street
PO Box 5013
Wellington 6140
New Zealand
T+64 4 496 2000

s 9(2)(a)

By email: s 9(2)(a)
Ref: H202200389

Tēnā koe s 9(2)(a)

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act), which was transferred from the Department of Internal Affairs (DIA) to the Ministry of Health (the Ministry) on 19 January 2022. Your request is as follows:

“Please advise me if the Ministry of Health informed you (DIA), or contacted you (DIA) for advice and guidance in regards to the creation and maintenance of the Covid Immunisation Register (CIR)?

Was a formal risk assessment completed ?

Please outline whether any security or privacy risks you advised them of, have have been fixed or accepted (as a residual risk)?

Is the data (of the CIR) also encrypted when in transit over public systems, including any Internet connection, public network or any other network NOT directly controlled by the agency?

Please accept this email as an Official Information request, with regards to your communication with the Ministry of Health in relation to the privacy risks in particular, in setting up and managing the CIR.”

Each part of your request has been addressed in turn below:

“Please advise me if the Ministry of Health informed you (DIA), or contacted you (DIA) for advice and guidance in regards to the creation and maintenance of the Covid Immunisation Register (CIR)?

Department of Internal Affairs (DIA) only provided privacy advice to the Ministry as part of the review process of the COVID Immunisation Register (CIR) Privacy Impact Assessment (PIA), more information on which is available here:

<https://www.health.govt.nz/system/files/documents/pages/privacy-impact-assessment-covid-19-immunisation-register-cir-071221.pdf>

The Ministry employ a Privacy Officer who follows privacy advice published by the Government Chief Privacy Officer (GCPO). The GCPO sits within the Digital Public Service branch of the DIA. For this reason, no further consultation was required.

Was a formal risk assessment completed ?

Please outline whether any security or privacy risks you advised them of, have been fixed or accepted (as a residual risk)?

As with all systems implemented within the Ministry, including COVID-19 systems, a formal security assurance process was completed as required by government agencies per the Protective Security Requirements.

This process includes completing a risk assessment as described in the New Zealand Information Security Manual. This was completed and formally signed off by the Ministry's General Manager National Digital Services and the Chief Information Security Officer.

Is the data (of the CIR) also encrypted when in transit over public systems, including any Internet connection, public network or any other network NOT directly controlled by the agency?

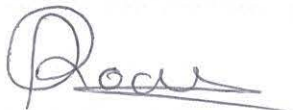
Yes, we use Transport Layer Security (TLS) encryption over public or untrusted connections.

You may be interested to know all PIAs completed in relation to the Ministry's COVID-19 systems and processes, including for the CIR, are available on the Ministry's website. This information is available here: www.health.govt.nz/our-work/diseases-and-conditions/covid-19-novel-coronavirus/covid-19-resources-and-tools/covid-19-your-privacy.

Under section 28(3) of the Act you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: info@ombudsman.parliament.nz or by calling 0800 802 602.

Please note that this response, with your personal details removed, may be published on the Ministry of Health website at: www.health.govt.nz/about-ministry/information-releases.

Nāku noa, nā



Astrid Koornneef
Director
National Immunisation Programme