

25 January 2022

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s 9(2)(a)

By email: s 9(2)(a)
Ref: H202116571

Tēnā koe s 9(2)(a)

Response to your request for official information

Thank you for your email of 23 November 2021, requesting the following information under the Official Information Act 1982 (the Act):

“all documents pertaining to the design of the COVID-19 Vaccine Pass Platform. We are especially interested in what input DIA and/or INZ had in the design.”

On 8 December 2021, the Ministry informed you via email that your 23 November request was interpreted as including a very large volume of information, and consequently may be refused under section 18(f) of the Act unless a refinement to the scope is made. This correspondence is copied below:

“We are contacting you in accordance with section 18F of the Official Information Act 1982 (the Act) as your request, as it is currently worded, is for a very large volume of information. Your request may be refused under section 18(f) of the Act as the information requested cannot be made available without substantial collation or research.

There are several things that contribute to the large scope of this request. There are separate project streams, (Digital Identity, COVID-19 Consumer Channels, and then digital certificates) that have been working on aspects of the current solution components for some time (some started in 2019). If it is possible for you to narrow the scope of your request, we may be able to provide you with information. The following points may assist you with refining your request to a specific aspect of the NZ COVID Pass:

- *My Health Account is a standalone service, providing a digital identity solution for the health sector in general.*
- *My Covid Record is a standalone service that provides digital access to COVID-19 vaccination and test results and uses My Health Account as a secure digital identity to log in with.*
- *My Covid Record is one of the channels (alongside 0800 numbers, and pharmacies etc) to request a My Vaccine Pass.*
- *There are also tools in the Salesforce platform (CIR/CICS) that are used by the assisted service channels to request passes on behalf of people (via 0800 numbers or in person at pharmacies/GPs etc).*

All of these solutions have their own design documentation and other functionality for things outside the domestic vaccination pass solution. [My Health Account](#), [My Covid Record](#) (and supporting [APIs](#)), and the [COVID-19 Immunisation Register](#) have publicly available Privacy

Impact Assessments. These PIAs cover some of the technical design and implementation of each solution, which may also answer some of your questions.”

On 9 December 2021, you responded that “we are only interested in aspects relating to the COVID19 Vaccine Pass”.

Following your email of 9 December 2021, the Ministry responded with the following:

“The Ministry would like to talk to you about your request. Would it be possible for you to provide us with a phone number (via email, oiagr@health.govt.nz) so we can contact you about this request. Despite efforts to refine, the scope of your request is still unclear”.

Later in the day on 9 December 2021 you responded: “Apologies for the confusion and thank you for your attempts to clarify. I have asked FYI to provide me with the email address so that I can give you my contact information. We are interested in aspects relating to the Covid19 Vaccine Pass that relate to transgender, non binary, and intersex people and also that relate to refugees”.

The Ministry does not hold specific design documentation related to “transgender, non binary, intersex people or refugees”. In the absence of the requested documentation, the Ministry is able to provide considerations identified during the design process for My Health Account that may be of interest to you as they apply to obtaining and using a My Vaccine Pass.

My Vaccine Pass is an official record of your COVID-19 vaccination status for use within Aotearoa New Zealand. There are three ways to get your My Vaccine Pass: online through My Covid Record, over the phone, and in person at a participating vaccination site. The quickest way to get a pass is through the website My Covid Record.

As stated previously, My Covid Record is a standalone service that provides digital access to COVID-19 vaccination and test results and uses My Health Account as a secure digital identity log in. The National Health Index (NHI) matching process used by My Health Account can utilise gender to help match a user’s details to their NHI number. This allows for verification of identity by extensive automatic matching against NHI records.

The following considerations were factored into during the design of the process for obtaining My Vaccine Pass via My Covid Record or assisted service channels, as they pertain to gender:

- Providing gender should be optional so that if users were not comfortable providing such information, it was not required.
- Asking for gender information should be consistent with Statistics NZ’s approach www.stats.govt.nz/consultations/sex-and-gender-identity-statistical-standards-consultation.
- If the gender that is inputted by the user is different from the gender recorded on the NHI database, then that would not necessarily preclude automatic matching of the NHI – this is built into the NHI matching algorithm.
- Gender is not a feature of My Health Account. The Ministry does not store or share a person’s gender with integrating applications.
- Gender was not a characteristic used to check documents when creating a profile in My Health Account, so if users were not comfortable providing this information it was not required.
- Users are able to set their own preferred name, which would subsequently be used to address them when they were using the My Health Account self-service portal, and it would be available across integrating systems should they choose to use them.

Please be assured we will continue to implement strategies that help make our programme as inclusive and equitable as possible for all New Zealanders.

As mentioned above, My Covid Record is only one of the options available for people seeking to obtain a My Vaccine Pass. In order to cater for people without one of the accepted forms of identification, the Ministry has made it possible to get a My Vaccine Pass over the phone or at a participating vaccination site. Obtaining a My Vaccine Pass via these channels does not require identification, and instead personal details are requested in order to find the individual within Ministry systems.

Work is continuing on acceptable forms of identification. The Ministry intends to offer online and offline alternatives that involve a person trusted by both the user and the health system such as a health professional or kaumātua verifying the identity of users who may not have identity documents. These solutions are more likely to work for refugees because they may only require registration with a health provider, such as a general practitioner.

Regarding refugees, the My Health Account design process considered the following in choosing the acceptable documents for users creating a profile:

- The document must be available for real-time document checking through our vendor – Cloudcheck.
- The document should be widely used in New Zealand and not easily substituted for another form of identification.

The six following forms of identification were selected as being able to be used to validate and trust proof of identity in My Covid Record:

- New Zealand Drivers' Licence
- New Zealand Passport
- New Zealand Birth Certificate
- New Zealand Citizenship Certificate
- Australian Passport
- Australian Birth Certificate.

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.

Nāku noa, nā



Astrid Koornneef
Director
National Immunisation Programme