



19 June 2025

Tēnā koe

### **Official Information Act and Privacy Act request**

Thank you for your emails of 21 May 2025, highlighting your concerns around the amount of identity information you are required to provide to register as a Ministry of Social Development (Ministry) supplier of accommodation.

I have considered your request under the Official Information Act 1982 (the Act) and the Privacy Act 2020. Please find my decision on each part of your request set out separately below.

The OIA team has been forwarded a lengthy email chain between you and the Ministry's Supplier Registrations team. I am answering the two questions we have identified as requests to the Ministry for information about privacy issues. For other more routine queries, please continue working with the Supplier Registrations team.

- 1. Please state under which legislation would you require us to provide such documents (i.e. photo ID of the homeowner that they property manage). Would I require a letter from your boss to say that you are authorised to ask such information from us? & a photo ID from you and your boss? This is just plain silly.*

I will address this request in two parts.

*Background to new requirements for applicants registering to become an accommodation supplier.*

In September 2022, the Ministry's Hardship Supplier process was strengthened for Accommodation Suppliers and new business rules were created with the aim to safeguard our clients and suppliers. New requirements including photo identification and proof of ownership were added and the Work and Income website was updated with the new requirements.

Our Supplier teams were advised that photo identification was added as a requirement for all accommodation suppliers to verify the applicant matched the individual or institution that was being applied for, ensure that payments are being made to a legitimate supplier and to support preventing fraudulent activity from occurring or harm coming to our clients – financial or otherwise.

*The legislation requiring suppliers to provide photo identification when registering.*

There is no specific legislation requiring photo identification when signing up to be a supplier with a government department. The Public Finance Act 1989, which can be found here: [www.legislation.govt.nz/act/public/1989/0044/latest/DLM160809.html](http://www.legislation.govt.nz/act/public/1989/0044/latest/DLM160809.html), sets out that our Chief Executive is responsible to the responsible Minister for the financial management, financial performance, and financial sustainability of the department. You can view two specific sections of the Public Finance Act that provide the basis for our request: section 34 (Responsibilities of chief executives: financial management of departmental matters) and section 35 (Responsibilities of chief executives: financial management of non-departmental matters).

This is further explained in instructions provided by The Treasury to government departments. The most recent instruction can be found here: [www.treasury.govt.nz/sites/default/files/2024-08/treasury-instructions-2024.pdf](http://www.treasury.govt.nz/sites/default/files/2024-08/treasury-instructions-2024.pdf)

On page 57, the Treasury Instruction states:

*"The [Public Finance] Act makes departmental Chief Executives responsible for the financial management, financial performance and financial sustainability of their departments (section 34 of the Act) and specifies their responsibilities in respect of non-departmental activity administered by the department (section 35 of the Act). Chief Executives are responsible for operating their own accounting and management systems and establishing day to day procedures to support those systems."*

As part of our Chief Executive's responsibility to ensure the Ministry's finances are managed appropriately (including ensuring that payments are made to the right people/supplier), the Ministry has implemented a requirement that all people and entities receiving payments from us must be verified (to various degrees as appropriate).

2. *I contacted the Privacy Commissioner today regarding my concerns to send over IDs via email since the 2020 privacy act change. If I email MSD any ID's I am responsible if they get misused after I have emailed them to you. Also - I am not sure the number of MSD staff who will have access to the emails that I will be emailed through - can you let me know what is the security level and how can you be assured that my IDs will be safe? Where are you saving it against? & will your staff have access to it and print it out for other purposes? I am shocked that MSD has no measures or training in place and staff seems to think people can just give you their IDs because we need to house and assist tenants in need. Also when I worked for other agencies none of this was ever a requirement so I am surprised after years of dealing with WINZ that we now need to submit private information to you that you don't need at all. Plus - we have previously supplied enough information and at this time we are just needing to reinstate our account!*

Protecting the privacy of personal information underpins the work the Ministry does and the services we provide. The Ministry has obligations under the Privacy Act 2020 to protect personal information and use information in accordance with the

principles of that Act. The principles of the Privacy Act 2020 cover all aspects of information management, including its collection, use and disclosure, how we store it, provide access to it, and the correction of it, and how we keep it secure as well as accurate and up to date. When we use information that has been provided to us for a specific purpose, we must only use it for that purpose unless a specified exception applies.

Information Privacy Principle 8 of the Privacy Act requires an organisation to check before using personal information that it is accurate, up to date, complete, relevant, and not misleading. Verifying the identity of our suppliers is part of our internal control process to ensure actions have met the required criteria and to give us assurance and confidence over the integrity of our payment systems. It also reduces the risk of errors and fraud.

On commencement of employment at the Ministry, all public servants must commit to the Public Service Code of Conduct. The Code of Conduct, also called the Standards of Integrity and Conduct, places obligations on all public servants working in government agencies.

You can find more information about those obligations on the Public Service Commission website here: [www.publicservice.govt.nz/guidance/guidance-understanding-the-code-of-conduct](http://www.publicservice.govt.nz/guidance/guidance-understanding-the-code-of-conduct).

Staff must take care to ensure that Ministry and client information is only accessible to authorised people for authorised use. The Code of Conduct prohibits the misuse of information including accessing, falsifying, requesting, or sharing of information without a business purpose. The Ministry has a zero-tolerance policy for the misuse of personal information.

When staff first join the Ministry, they must complete the following two training modules:

- Code of Conduct and regular refreshers on the Code
- the Information Management, Privacy and Security learning modules of the Ministry's staff induction programme, which emphasise the Ministry's Privacy, Human Rights and Ethics, Information Security, and Information Governance policies.

Additional privacy training is delivered to frontline staff on an ad hoc basis, based on need, trends or commission.

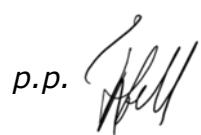
I will be publishing this decision letter, with your personal details deleted, on the Ministry's website in due course.

If you wish to discuss this response with us, please feel free to contact [OIA Requests@msd.govt.nz](mailto:OIA Requests@msd.govt.nz).

If you are not satisfied with my decision on your request, you have the right to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz) or 0800 802 602.

Ngā mihi nui

p.p.



Anna Graham  
**General Manager**  
**Ministerial and Executive Services**