

29 October 2024

File Ref: OIA 49640



Tēnā koe 

Official Information Act request

Thank you for your information request dated 21 September 2024. Your request has been considered in accordance with the Official Information Act 1982 (the Act). Your questions and our responses are set out below.

“1. Please consider this correspondence to be a request pursuant to the Official Information Act 1982.”

2. “Does Te Puni Kōkiri pay for advertising services on the Facebook, Instagram, LinkedIn, Google, Tik Tok or other digital platform”?

On 30 September 2024 you clarified the scope of this question as follows:

“Question 2 – this covers the last five financial years, from 1 July 2019 until 30 June 2024, and from 1 July 2024 until the date of my request.”

We have interpreted this question, as paying a digital platform directly for the use of advertising services on that platform. Facebook is the only digital platform Te Puni Kōkiri has paid for the use of advertising from, in the last five financial years to the date of this request.

a. “If so, how much money has been spent, by year, on advertising on each of these platforms”?

The table below outlines how much money has been spent, by year, on advertising on Facebook.

Financial year	Facebook Advertising Cost \$ (excl. GST)
2019/20	221.40
2020/21	-
2021/22	774.81
2022/23	156.53
2023/24	33.15
2024/25	-
TOTAL	\$1,185.89

- b. *“Does Te Puni Kōkiri use any agencies to place or manage that advertising, if so who?”*
- c. *If Te Puni Kōkiri uses any agencies to place or manage that advertising, what is (or are) the names of each of those agencies?”*
- d. *If Te Puni Kōkiri uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and Te Puni Kōkiri”.*

Te Puni Kōkiri does not use any agency to place or manage Facebook advertising.

3. *“If Te Puni Kōkiri uses advertising services on digital platforms as above, does (or has) the agency created "custom audience" lists as part of those campaigns?*

- a. *If so, please provide a list of the custom lists that have been generated, including the number of people on that list and what market segmentation was being targeted by that campaign and the date for which each custom audience was generated, along with when these audience lists were uploaded and to which platform?*
- b. *If so, what privacy analysis was conducted prior to custom audience lists being generated?*
- c. *If so, was the Minister responsible ever made aware that Te Puni Kōkiri was undertaking this activity? If so, which Minister was it, and when were they notified?*
- d. *If so, what advice was sought prior to this activity taking place?*
- e. *If so, what lawful basis does Te Puni Kōkiri rely on for this disclosure?*
- f. *If so, what was the origin of the information that was included in these custom audience lists?*
- g. *If so, did Te Puni Kōkiri receive any specific advice as to the efficacy of the security measures around these lists, if so, who provided this advice and when was it provided? Please provide copies of the advice provided.*
- h. *If so, what security measures are used to protect the privacy of individuals?*
- i. *If so, is Te Puni Kōkiri still generating and uploading custom audiences, or is this practice "on hold". If it is on hold, when and why was it put on hold?*
- j. *If so, can people "opt-out" of being included in these custom audience lists, and if so, how many people have done so?*
- k. *If so, has Te Puni Kōkiri received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and any responses.*
- l. *If so, did Te Puni Kōkiri consult with the office of the Privacy Commissioner on this practice? If so, when?*
- m. *If so, has Te Puni Kōkiri received any reports about the effectiveness of custom audience lists? If so, please provide these.*

n. If so, for each upload of the custom audience lists to each platform, what percentage of these were "matched" against the current users of each platform"?

Te Puni Kōkiri does not create "custom audience" lists as part of Facebook advertising.

4. "Has any person from Te Puni Kōkiri had any meetings, whether in person, by videoconference or other method, with any representative from Meta, Google, LinkedIn, Tik Tok, or any other digital advertising platform in the last 12 months?

a. If so, who was present during these meetings?

On 30 September 2024 you clarified the scope of this question as follows:

"Question 4 – this covers any meeting, regardless of what is discussed".

In the last 12 months, there have been two Te Puni Kōkiri kaimahi who have attended two separate meetings with representatives from Google. The table below outlines who was present during these meetings.

Date of Hui	Attendees
6 August 2024	<ul style="list-style-type: none">• Te Puni Kōkiri – Stuart Gregory – General Manager Information Systems,• Google – Karen Dahut, Leigh Palmer, Paul Dearlove• Wider Public Service – Multiple – should be sought from Government Chief Digital Officer if needed
26 August 2024	<ul style="list-style-type: none">• Te Puni Kōkiri – Stuart Gregory – General Manager Information Systems, Gareth Edwards, Acting General Manager Data and Insights.• Google – Paul Dearlove Head of Google Cloud New Zealand, Leah Kaplan• NGIS – Nathan Eaton (NGIS.com.au)

b. If so, please provide the agenda, notes, minutes and any communications associated with these meetings.

Three documents have been identified as in scope of your request for communications associated with these meetings. There was no agenda or minutes taken for these meetings. The documents and our decisions with regard to the release of the information are set out in the table attached as Appendix A.

Some information has been withheld in accordance with the Act on the following grounds:

- Section 9(2)(a) – *to protect the privacy of natural persons.*

In making the decision to withhold information, I have considered the public interest considerations in section 9(1) of the Act.

c. Does Te Puni Kōkiri have a dedicated account manager with Meta, Google, LinkedIn, Tok Tok or any other digital advertising platform. If so, what is the name of this person or the names of these people?"

Te Puni Kōkiri does not have a dedicated account manager for any digital advertising platform.

5. "Please provide any correspondence, e-mail, document, or record held by Te Puni Kōkiri on the subject of custom audience lists, advertising on Meta, Facebook, Instagram, Google, Tik Tok or any other platform for the period 1 September 2024 and today".

One document has been identified as in scope of this part of your request. This is item 4 in the table provided as Appendix A.

Some information has been withheld from this document in accordance with the Act on the following grounds:

- Section 9(2)(a) – *to protect the privacy of natural persons.*

In making the decision to withhold information, I have considered the public interest considerations in section 9(1) of the Act.

I trust my response satisfies your request.

You have the right to seek an investigation and review by the Ombudsman of this response. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that Te Puni Kōkiri publishes some of its OIA responses on its website, after the response is sent to the requester. The responses published are those that are considered to have a high level of public interest. We will not publish your name, address or contact details.

If you wish to discuss any aspect of your request with us, including this decision, please feel free to contact us at oia@tpk.govt.nz.

Ngā mihi



Stuart Gregory
Hautū, Te Puni Rangatapu | Deputy Secretary, Corporate (Acting)

Appendix A – documents OIA request from [REDACTED] dated 21 September 2024

Item	Date	Document description	Decision
1.	2 August 2024	Email: <i>Google Public Service session</i>	Released with certain information withheld under 9(2)(a)
2.	13 August 2024	Email: <i>Re: Google Cloud / NZ Government - introduction and overview</i>	Released with certain information withheld under 9(2)(a)
3.	3 September 2024	Email: <i>RE: Māori data ask</i>	Released with certain information withheld under 9(2)(a)
4.	10 September 2024	Email: <i>Custom audiences OIA</i>	Released with certain information withheld under 9(2)(a)

Subject: FW: Google Public Service session
Location: Microsoft Teams Meeting

Start: Tue 6/08/2024 2:45 pm
End: Tue 6/08/2024 3:45 pm
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Ann-Marie Cavanagh

-----Original Appointment-----

From: Ann-Marie Cavanagh <9(2)(a)>
Sent: Friday, August 2, 2024 2:40 PM
To: Ann-Marie Cavanagh; 9(2)(a)

9(2)(a)

Stuart Gregory; 9(2)(a)

9(2)(a)

Subject: Google Public Service session
When: Tuesday, 6 August 2024 2:45 pm-3:45 pm (UTC+12:00) Auckland, Wellington.
Where: Microsoft Teams Meeting

Kia ora,

Apologies for the short notice, but there is an opportunity to hear from Karen Dahut, the CEO of Google Public Sector business, and Leigh Palmer, Vice President of US Public Sector about Google's public sector involvement around the world (local, regional, national).

These two senior representatives will be in Australia, so the time zones offer an opportunity to ask questions of Google in areas like AI, digital resilience and digital government.

You are welcome to share the invitation with your key digital, strategy and transformation people. We look forward to seeing you on Tuesday.

Please find teams link below.

Ngā mihi,

Ann-Marie

Ann-Marie Cavanagh | Deputy Government Chief Digital Officer

Te Kōtahi Whitiwhiti | Digital Public Service Branch

Te Tari Taiwhenua | The Department of Internal Affairs

Direct Dial: 9(2)(a) Mob: 9(2)(a) 9(2)(a)

45 Pipitea Street, Thorndon | PO Box 805, Wellington 6140, New Zealand | www.dia.govt.nz | www.digital.govt.nz



Te Tari Taiwhenua
Internal Affairs

Microsoft Teams [Need help?](#)

[Join the meeting now](#)

Meeting ID: 444 094 347 399

Passcode: iVN6MZ

For organizers: [Meeting options](#)

From: [Paul Dearlove](#)
To: [Stuart Gregory](#)
Cc: [Nathan Eaton](#); [Leah Kaplan](#)
Subject: Re: Google Cloud / NZ Government - introduction and overview
Date: Wednesday, 14 August 2024 8:13:27 am
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[image005.png](#)

Thanks Stuart,

I've looped in [@Nathan Eaton](#) and [@Leah Kaplan](#) who were both part of the presentation to Minister Watts (both are based in NZT - 4) so afternoon is better for us. It looks like you're free at 1-3pm so I'll put in a placeholder for that time and, once confirmed with Nathan and Leah, reduce it back to 60 mins.

Regards

Paul

On Tue, Aug 13, 2024 at 11:38 AM Stuart Gregory [9\(2\)\(a\)@tpk.govt.nz](#) wrote:

Kia ora Paul,

Great to hear – just so you know we have a site ([tkm.govt.nz](#)) that maps iwi location including Marae. While it is incredibly old from a CMS perspective, the data is as accurate as you might find. This could be a good source of data for this mahi.

It would be great to see the work you have done already, and I'd invite my colleague in our data and insights area too. I'm pretty pressed this week, but how about week of the 26th? I'm relatively free Monday.

Ngā mihi,

Stuart Gregory
*Pa ārah – Ngā Pūnaha Pārongo/General
 Manager - I formation Systems (CIO/CISO)*

*Waea Pūkoro M : [9\(2\)\(a\)](#)
 Waea Whakaahua F : 0800 875 329*

Te Puni Kōkiri, Te Puni Kōkiri House, 143 Lambton Quay, Wellington 6011

[Te Puni Kōkiri Website](#) [Kōkiri Magazine](#) [Facebook](#)

Outside Te Puni Kōkiri and want to see when I am free? Check my [calendar](#)

From: Paul Dearlove [9\(2\)\(a\)](#)
Sent: Tuesday, August 13, 2024 8:19 AM
To: Stuart Gregory [9\(2\)\(a\)](#) [@tpk.govt.nz](#); Damien Kelly [9\(2\)\(a\)](#)
Subject: Re: Google Cloud / NZ Government - introduction and overview

Thanks for the note Stuart,

I also wanted to let you know about a separate meeting we had on Wednesday with Minister Watts (in his Climate Change capacity) and a piece of work we're exploring mapping the Marae across NZ and evaluating their susceptibility to climate change and weather events. Very happy to set up a briefing for you and the TPK team to show you this capability. We've also built a conversational AI (using GenAI) to interrogate the data and make it more accessible for those who are less comfortable with accessing technology.

Please let me know.

Regards

Paul



[Paul Dearlove](#)

Country Manager
Google Cloud
New Zealand

9(2)(a)

On Tue, Aug 13, 2024 at 7:41 AM Stuart Gregory 9(2)(a) <@tpk.govt.nz> wrote:

Many thanks Karen and Paul, was good to hear about alternatives and your use cases.

Ngā mihi

Stuart

From: Karen Dahut 9(2)(a)

Sent: Tuesday, August 13, 2024 12:20:50 AM

To: Paul Dearlove 9(2)(a)

Subject: Google Cloud / NZ Government - introduction and overview

You don't often get email from 9(2)(a) [Learn why this is important](#)

Dear NZ Government Team,

Thank you for meeting with us on Tuesday last week. We really appreciated the opportunity to tell you more about Google Public Sector's ongoing work, particularly around;

- our approach to leveraging AI for emergency disaster relief,
- supporting government/business continuity in the event of a disaster, cyberattack or outage, and

improving call center experience.

We look forward to deepening our relationship with you and looking for ways to further our partnership.

We also welcome further discussion where we can share global examples and our best practices on several other key topics you discussed. Please advise if and when you or your team would like to engage our local and international experts to share more about Google's approaches.

We look forward to working on these critical matters in partnership with you and your team.

Sincerely,

Karen Dahut



Karen Dahut
Chief Executive Officer
Google Public Sector
9(2)(a)

RELEASED UNDER THE
OFFICIAL INFORMATION ACT

From: [Nathan Eaton](#)
To: [Paul Dearlove](#); [Stuart Gregory](#); [Leah Kaplan](#)
Cc: [Gareth Edwards](#)
Subject: RE: Māori data ask
Date: Friday, 6 September 2024 3:51:56 pm
Attachments: [image001.png](#)
[image002.png](#)
[image004.png](#)
[image005.png](#)
[image006.png](#)
[image007.png](#)
[image008.png](#)
[image009.png](#)
[image010.png](#)

Some people who received this message don't often get email from **9(2)(a)** [Learn why this is important](#)

Hi Stuart,

We would take your guidance regarding the appropriate data to use but we were initially thinking of overlaying the Iwi boundaries with any points of significance within each Iwi (ie Marae). We want to make sure we are using both the appropriate and authoritative datasets.

In terms of the data formats we would be looking for a GIS specific data format such as shapefile.

Regards

Nathan Eaton
 Executive Director



Eastpoint Plaza, Suite 5.01, Level 5, 233 Adelaide Terrace
 Perth, WA 6000, Australia

From: Paul Dearlove **9(2)(a)**
Sent: 06 September 2024 07:46
To: Stuart Gregory **9(2)(a)** <[@tpk.govt.nz](#)>; Nathan Eaton <**9(2)(a)**>; Leah Kaplan **9(2)(a)**
Cc: Gareth Edwards **9(2)(a)** <[@tpk.govt.nz](#)>
Subject: Re: Māori data ask

This email originated outside NGIS's network. If you do not recognise the sender or did not expect this email then please do not open any attachments or click any link.

Hi Stuart,

Apologies for the delay. We presented back to MfE yesterday and I wanted to make sure we were clear on what is being built by the government team and what is already in place.

I've looped in **9(2)(a)** who can confirm exactly what we need but, looking at the website - it appears that there is a lot of raw data available. Nathan - can you give a bit more clarity in what we'd need to access?

Regards

Paul

On Tue, Sep 3, 2024 at 11:25 AM Stuart Gregory <9(2)(a)@tpk.govt.nz> wrote:

Kia ora Paul,

Thanks for meeting with Gareth and I last week. Following our conversation, Gareth and I met to discuss what we could offer as part of the conversation and it would be helpful if we can get a really clear ask from you on what you need/would like to have access to.

As you know, Māori data has a number of principles that govern its use, so we want to ensure we are engaging the correct people on our end before we move forward.

Ngā mihi,

Stuart Gregory

*Paeārahi – Ngā Pūnaha Pārongo/General
Manager - Information Systems (CIO/CISO)*



Waea Pūkoro M: 9(2)(a)
Waea Whakaahua F: 0800 875 329

Te Puni Kōkiri, Te Puni Kōkiri House, 143 Lambton Quay, Wellington 6011



[Te Puni Kōkiri Website](#)



[Kōkiri Magazine](#)



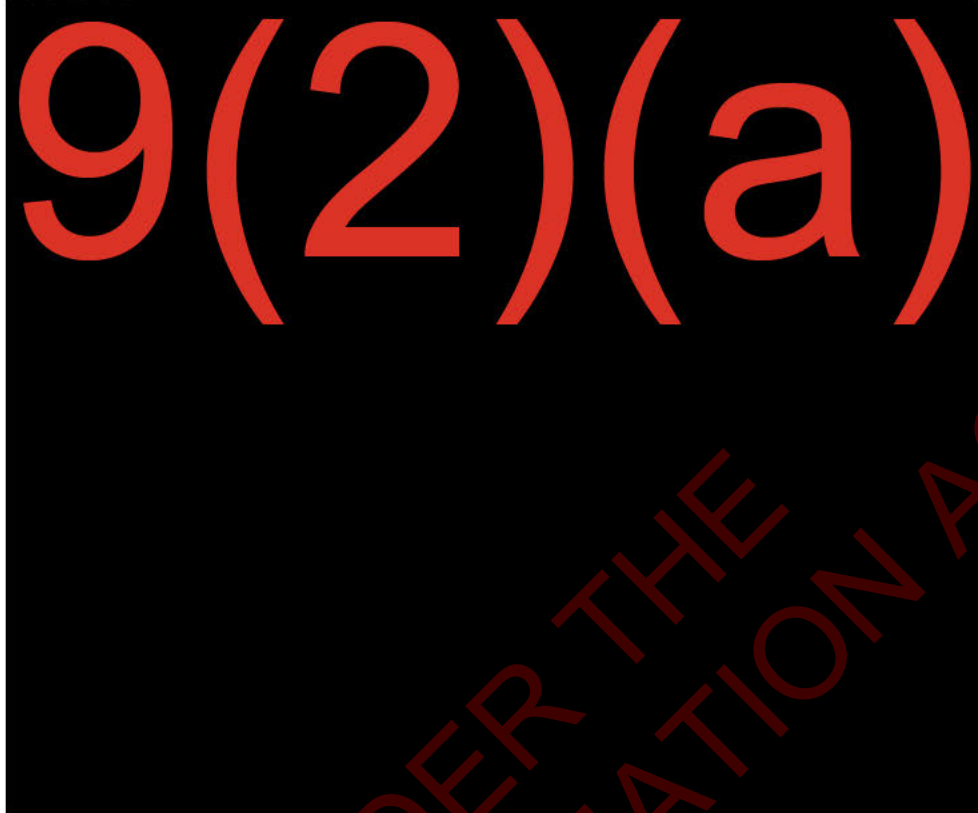
[Facebook](#)

Outside Te Puni Kōkiri and want to see when I am free? Check my [calendar](#)

RELEASED UNDER THE OFFICIAL INFORMATION ACT

From:
To:

9(2)(a)



Cc: Rosa Boyd; 9(2)(a)
Subject: Custom audiences OIA
Date: Tuesday, 10 September 2024 10:17:15 am
Attachments: [image001.png](#)

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[IN CONFIDENCE RELEASE EXTERNAL]

Kia ora all,

You're likely aware that we (Inland Revenue) are getting a number of media queries and OIAs on our use of custom audience lists in social media.

I thought I'd touch base as I'd assume you'll also be getting a few OIAs on this topic coming your way. Do any of your teams use custom audiences?

I thought it might be helpful to share our key messages (obviously how agencies use custom audiences will vary, this is our response):

- the use of custom audiences lists (which includes the process of hashing data when the lists are uploaded) is common practice, and we operate well within the guidelines of the NZ Information Security manual, which is maintained by the GCSB.
- we can only match customer data as they have already provided it to the social media platform (we do not provide new data) and all data for custom audience lists is hashed when uploaded. This means it is un-identifiable when it gets to the social media platform. Hashing is a type of cryptographic security method that turns

identifiers into randomised code and cannot be reversed so identities are protected.
For example, John.doe@ird.govt.nz may come out hashed as
wLKziR/6RoXDv1MDaXLH1UNUC9nIVr97jrTnL4TcxsM=.

Cheers,

9(2)(a)

Service Leader Marketing and Communications
Inland Revenue | P O Box 2198 | Wellington 6014

T. 9(2)(a)



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