

School Board Elections Privacy Impact Assessment

Friday 13th May 2022

Below is an assessment of the nomination system and online voting system against the 13 Information Privacy Principles(IPP) included in the Privacy Act 2020.

Nomination process

Information provided by School clients to CES consists of a record for all eligible voters of their full name, postal address, MoE school number, mobile phone number and email address (if available). Through the nomination portal candidates provide to CES their name, postal address, photo (optional), mobile phone number, e mail address, candidate statement, gender, statistical information required by MoE. This information is provided to Electionz.com for the election process.

Election process

Information provided to electionz.com consists of a record for all eligible voters of their full name, postal address, mobile phone number, MoE school number and email address (if available). The information collected by electionz.com consists of a returned voting paper if the voter chooses the postal voting option or, if the voter chooses online voting, electionz.com will obtain a record of the vote and the IP address from the device used for casting the online vote.

Nomination Process**IPP1: Purpose of Collection of Personal Information**

This principle provides that personal information should not be collected by CES and Electionz.com unless it is for a lawful purpose connected with a function or activity of electionz.com and is necessary for that purpose.

CES receives records of eligible voters from Schools through CES contract with those schools. CES also receives nominations from candidates through the nomination portal. After formatting this information is then passed onto electionz.com for the election process via OneDrive/ DropBox.

Election process

electionz.com receives records of eligible voters from CES who are authorised to do so via their School Returning Officer Services Contract. From these records, electionz.com compiles the electoral rolls. The information on the roll is an individual's full name, postal address and email address (if available). The purpose of obtaining this information is to provide all eligible voters with a nomination form which is either emailed (if email address has been supplied) or printed and mailed. It is also used for mailing out the voter packs.

If a voter chooses to use the online voting method, electionz.com will record the IP address used for the voting session. The IP address does not identify a specific individual and is obtained for audit log purposes and is necessary for the accurate calculation of votes should any part of the election be questioned.

In both instances of paper vote or online voting the voter is made aware of information obtained by electionz.com.

Nomination Process**IPP2: Source of Personal Information**

This principle requires that CES and Electionz.com collects personal information directly from the person concerned unless a specified exception applies.

CES obtains personal information from School clients and also candidates who submit their candidacy through the nomination portal

Election process

electionz.com obtains personal information indirectly from the individual concerned.

Personal information is obtained from CES. Further if an individual were to change their information details, electionz.com does not hold this information and informs the individual to update their details at the school.

IPP 3: Collection of Information from Subject

This principle requires that, where CES and electionz.com collects personal information directly from the person concerned, it must take reasonable steps to ensure that the person concerned is made aware of:

- *The fact that information is being collected*
- *The purposes for collection*
- *The intended recipients*
- *The contact details of the agency collecting the information and the agency that will store it*
- *The law under which the personal information is collected*
- *Whether the supply of information is voluntary or mandatory*
- *The consequences for not providing the requested information*
- *Rights of access and correction to personal information.*

Nomination Process

CES does not collect personal information which may otherwise be unknown to the public.

CES provides a privacy statement to School clients and on the nomination portal which makes it clear what information is recorded, why it is being recorded, with whom it will be shared and why, the individual's legal rights, whether the information to be supplied is mandatory or optional and the consequences of not providing it.

Election process

electionz.com does not collect personal information which may otherwise be unknown to the public.

electionz.com's published Privacy Policy and Security Statement (www.electionz.com/privacy) makes it clear what information is recorded, why it is being recorded, with whom it will be shared and why, the individual's legal rights, whether the information to be supplied is mandatory or optional and the consequences of not providing it (this relates more to nominations rather than voting).

IPP 4: Manner of Collection of Personal Information

This principle states that CES and electionz.com shall not collect personal information by unlawful, unfair or unreasonably intrusive means.

Nomination process

CES does not collect personal information other than a record for all eligible voters of their full name, postal address, MoE school number, mobile phone number and email address (if available). Through the nomination portal candidates provide to CES their name, postal address, photo (optional), mobile phone number, email address, candidate statement, gender, statistical information required by MoE. This information is provided to Electionz.com for the election purposes via OneDrive/ DropBox.

Election process

electionz.com does not collect personal information other than an individual's full name, postal address and MoE school number for the purposes of mailing nomination forms and mailing voter packs. Individual's email addresses are also provided (where available) by CES for the purpose of emailing nomination forms to individuals. The information obtained on an individual is supplied by CES and is limited to full name, postal address, MoE school number and email address.

IPP 5: Storage and Security of Personal Information

The Privacy Act 2020 requires that all reasonable steps be taken to ensure that personal information held by an agency is protected against:

- Loss
- Misuse
- Disclosure.

Additionally, all reasonable steps must be taken to prevent unauthorised use or unauthorised disclosure of the information when it's being transferred or supplied to another individual.

Nomination process

Key measures CES has in place to protect personal information within its corporate environment from loss, misuse and disclosure includes:

- Data transfer from Schools using OneDrive or DropBox
- Data transfer to electionz.com using DropBox or OneDrive.
- Data at rest is stored on OneDrive with access restricted to authenticated users

Election process

Key measures that electionz.com has in place to protect personal information within its corporate environment from loss, misuse and disclosure includes:

- Requiring valid Multi Factor Authentication (MFA) to gain access to electionz.com information.
- Data at rest is stored in encrypted files.
- Data in use is stored in encrypted databases.
- Online voter passwords for online voting are stored as secure, brute force resistant hash values.
- Data transfers to and from electionz.com are done via a secure Microsoft OneDrive service, requiring MFA for users to send data to electionz.com and to receive data from electionz.com.
- All internet transmissions are done via encrypted links.
- Please also refer to electionz.com's Incident Response Policy.

IPP 6: Access to Personal Information

This principle provides that, where CES and electionz.com holds personal information in a way that can be readily retrieved, the person concerned shall be entitled to obtain confirmation that the information is held, to have access to it and to be informed that they may request correction of it.

Nomination process

CES does not hold personal information other than full name, postal address, mobile phone number, MoE school number and email address. This information is stored within CES one drive system and is readily retrievable. As per CES published Privacy Policy individuals are informed, they may request correction of any erroneous data, however they will also be informed upon such request that any correction will only be temporary and that they should request their data to be corrected by their school, as the source of the erroneous data, to make any corrections permanent.

Election Process

electionz.com does not hold personal information other than full name, postal address, mobile phone number, MoE school number and email address. This information is stored within electionz.com's Election Management System (EMS) (an encrypted database) and is readily retrievable. As per our published Privacy Policy and Security Statement (www.electionz.com/privacy), individuals are informed they may request correction of any erroneous data, however they will also be informed upon such request that any correction will only be temporary and that they should request their data to be corrected by their school, as the source of the erroneous data, to make any corrections permanent.

IPP 7: Correction of Personal Information

This principle provides that CES and electionz.com must allow a person to request correction of their personal information and to request that a statement of correction be attached to the information considered erroneous.

Nomination process

CES Privacy Policy informs individuals we will correct any erroneous data they report. They will also be informed any correction will only be temporary and that they should request their data to be corrected by their school, as the source of the erroneous data, to make any corrections permanent.

Election process

Electionz.com Privacy Policy and Security Statement (www.electionz.com/privacy) informs individuals we will correct any erroneous data they report. They will also be informed any correction will only be temporary and that they should request their data to be corrected by their school, as the source of the erroneous data, to make any corrections permanent.

IPP 8: Accuracy of Personal Information to be checked before use

This principle states that CES and electionz.com shall not use personal information without taking reasonable steps to ensure that it is accurate, up to date, complete, relevant and not misleading.

Nomination process

CES is responsible for maintaining the accuracy of data sent to us by schools and candidates. We understand the data (being name, postal address, mobile phone number, MoE school number and email addresses) is in frequent use by school through their SMS systems day-to-day communication with parents/caregivers and therefore, any inaccuracies would be quickly identified and corrected by the schools.

Election process

electionz.com is responsible for maintaining the accuracy of the data sent to us by the schools, via CES. We understand the data (being name, postal address, MoE school number and email addresses) is in frequent use by the schools for day-to-day communication with parents/caregivers and therefore, any inaccuracies would be quickly identified and corrected by the schools.

electionz.com performs cleansing of the postal address fields, to ensure accuracy and compliance with NZ Post standards, for high delivery rates.

electionz.com is dependent on receiving records for eligible voters only.

IPP 9: Not to keep Personal Information for longer than necessary

This principle states that CES and electionz.com must not keep personal information for longer than is required for the purposes for which it may lawfully be used.

Nomination process

CES published Privacy Policy informs individuals their data will only be kept for as long as we require it to fulfil our legal obligations. This may include a period of time following declaration of final results, before data and documents may be legally destroyed.

Election process

electionz.com's published Privacy Policy and Security Statement informs individuals their data will only be kept for as long as we require it to fulfil our legal obligations. This may include a period of time following declaration of final results, before data and documents may be legally destroyed.

Upon destruction, a confirmation certificate is provided to the Returning Officer.

IPP 10: Limits on use of Personal Information

This principle provides that CES and electionz.com may not use personal information collected for any other purpose unless it can rely on one of the exemptions listed in Principle 10.

Nomination process

CES only uses personal information for the purpose of delivering an election. It is not used for any other purpose nor is it provided to any third parties for any other purpose.

Election process

electionz.com only uses personal information for the purpose of delivering an election. It is not used for any other purpose nor is it provided to any third parties for any other purpose.

IPP 11: Limits on Disclosure of Personal Information

This principle states that CES and electionz.com must not disclose personal information unless it has reasonable grounds to rely on one of the exemptions specified.

Nomination process

CES does not disclose personal information other than that required for electionz.com to undertake the election process.

Election process

electionz.com does not disclose personal information other than that required for a voter to receive their nomination form or voter pack.

IPP 12: Overseas disclosure of Personal Information

This principle states that electionz.com may only disclose personal information overseas, if the recipient has privacy obligations similar to New Zealand.

Nomination process

CES does not disclose personal information to any overseas parties.

Election process

electionz.com does not disclose personal information to any overseas parties.

IPP 13: Unique Identifiers

This principle states that CES and electionz.com must not assign a unique identifier to a person unless it is necessary for carrying out its functions efficiently.

Nomination process

CES does not assign unique identifiers to electors.

Election process

electionz.com assigns unique identifiers to electors when importing the electoral roll into EMS. The unique identifier is required for maintaining the integrity of the election (ie enforcing one vote per voter), for statistical purposes and for auditing purposes. However, it does not identify a voter's vote, which remains anonymous.
