

## MCH Privacy Breach: Situation as at 7.00pm, 22 August 2019

### Background

As part of the Tuia 250 event, berths on the vessels were offered to the public so that they could participate in the voyage. Members of the public applied for those berths.

Successful applicants directly uploaded their information to the Tuia250 website ([www.tuia250.nz](http://www.tuia250.nz)), which included images of forms of identification (predominantly passports or drivers licences).

The Tuia250 website was built specifically for the commemoration by [9(2)(a)] – under contract from MCH. As part of the website, [9(2)(a)] created the web form where the applicants information was uploaded.

### Issue

MCH was contacted at 9.58am today by the parent of a trainee that [9(2)(a)] drivers licence [REDACTED]. It was determined the image of the drivers licence had originated from the Tuia250 website.

Immediately on being notified we removed the image from the website.

At 11.47am, an MCH Manager called [9(2)(a)] of that trainee to apologise and advise [9(2)(a)] that we had removed the image.

At that point we tested to see whether this was a wider problem with images of personal identification searchable through Google. We established that it was. The information from some successful applicants was indexed and could be accessed through a targeted Google search.

At 11.50, the issue was escalated to the CIO and DCE. A team was established immediately and the following actions were directed:

- Removal of all images containing personal information from the media library in the back end of the website.
- Contact with Google to work through the process of clearing Google's caches of these images.

MCH staff spoke to [9(2)(a)] to advise them of the issue and request that it be immediately resolved. We were given a verbal assurance that the Tuia250 website content was secure. We have not yet received that assurance in writing.

At 2.30pm we reconvened and agreed that SSC, the GCPO, the Office of the Privacy Commissioner and DIA should be contacted so that we got the right guidance about the best process for managing the issue. We also agreed that Ministers should be advised and provided with contingency messages.

Becky MacNeill, DCE contacted SSC setting out what we knew about the issue.

[9(2)(a)] contacted a staff member at the GCPO office to advise them of the issue and seek advice on our proposed course of action. The issue was escalated to the GCPO who then contacted the Director of the Digital Safety Team to seek their assistance in working with Google to expedite the process of clearing the Google cache. GCPO advised us to talk to the Privacy Commissioner. We have called the office and are waiting to hear back.

9(2)(a) also called the CLA at DIA. The CLA undertook to talk to her colleagues about placing a flag on passports that were searchable. We are waiting to hear back.

We continued to identify what was searchable and what was not and provide this information to Google.

At 3.45pm we met again. We reported back on conversations with the GCPO etc. We agreed comms messages and Ministers Offices were advised – PMO, Minister Davis, Minister Robertson as Associate ACH and Minister Sepuloni as Associate ACH. Additional resources were put on the issue.

SSC called Becky MacNeill at 4.45 and she went through the issue, what we had done to date and what our next steps were. SSC advised that we were taking the right steps.

At 5pm we met again. We agreed that the Police should be contacted by the DCE Tuia in relation to those individuals whose information may have been compromised.

We confirmed that all links to pieces of personal information identified have been provided to Google who have begun to remove the items from their cache.

Comms messages were sent to Ministers' Offices at 5.19pm.

Next steps:

The following additional actions are planned:

- Meeting with Police (scheduled for Friday morning)
- Formal notification to the Office of the Privacy Commissioner
- Finalising the list of affected trainees and contacting them all personally to advise what has happened and what has been done (this will not happen until further discussions with SSC)
- Contacting the Spirit of New Zealand (one of the vessels in the Tuia flotilla) who ran a separate expressions of interest process. Their process was not affected but they may receive queries from some applicants.
- Confirm the material has been removed from Google's caches.
- Contact GCDO for advice on independent verification that our websites are now secure in relation to personal information.
- Consider which other stakeholders may have an interest and should be advised.
- Seek advice from MSD about any particular care we need to take in relation to young people whose information may have been compromised (applications were accepted from individuals aged 16 and over).
- Discuss with DIA and NZTA whether a process could be set up for those whose information has been compromised to replace those documents easily and without charge
- Work with the website provider to ensure the website is secure and that no other search engine has material cached.