

26 August 2025

Dear

Thank you for your request made under the Official Information Act 1982 (OIA), received on 29 July 2025. You requested the following (numbered for ease of response):

Please confirm whether Verian NZ and/or The Navigators Ltd act or have acted on behalf of IRD.

# If they do:

- 1. Please confirm what data is shared with them in working with them.
- 2. Please provide all meeting notes between the IRD and them
- 3. Please advise what the terms of reference are for these contracts
- 4. Please provide any advice received by the IRD relating to this in the context of recent data breaches, what precautions have been taken and what the risk of breach is considered acceptable
- 5. Please advise what steps have been taken to ensure Verian does not use this extensive data in advising other clients.
- 6. Please advise what advice has been received in the context of scam emails for example, how sending follow up emails to IRD calls from non-IRD domains affects trust and transparency
- 7. Please advise how many follow up emails IRD agreed Verian could send? How does this compare to what is generally considered harassment? At what point would a service complaint about regular follow ups be justified
- 8. Survey emails are stated to be anonymous. Does following a survey link notify that a specific user has clicked a survey link
- 9. does simply opening the email result in a notification to any party
- 10. what advice has the IRD received on "voluntary" follow ups to government enquiries and the impact this has on people from countries without a tradition of open government.
- 11. the email for follow up questions is to a non-govt, non-nz verian domain. Is any of this information (or any of the survey data) stored outside of New Zealand.
- 12. the email link to privacy policies is itself on a non-govt, non-NZ website. What discussion has there been about linking to an official page for this. Is there no available NZ govt webpage that could easily confirm this and most of the above
- 13. what is the response rate to these surveys
- 14. how many queries and/or complaints have you received (please consider this email a complaint)

On 22 August 2025, you clarified the timeframe of your request to be for the 12-month period from 29 July 2024 to 29 July 2025.

The second and third part of item 7 of your request do not constitute a request for official information under the OIA. Rather they are a request for an opinion. Official information is any information held by an agency subject to the OIA. This includes:

- documents, reports, memoranda, letters, emails and drafts
- non-written information, such as video or tape recordings
- the reasons for any decisions that have been made about you
- · manuals that set out internal rules, principles, policies or guidelines for decision-making
- agendas and minutes of meetings, including those not open to the public

Responding to your request would require Inland Revenue to engage in debate or to create justifications or explanations. The OIA does not require agencies such as Inland Revenue to do that (see the Ombudsman's website).<sup>1</sup>

However, please see below for information regarding the other parts of your request.

#### Item 1

Inland Revenue has not engaged The Navigators Ltd to act on our behalf.

Verian New Zealand conducts fieldwork for Inland Revenue's ongoing Customer Experience & Perceptions survey (CX&P). The CX&P survey is a weekly ongoing monitor that helps Inland Revenue measure trust, tax morale and customer experience over time.

To assist Verian in running the CX&P survey, Inland Revenue uses a secure file sharing platform to share data with Verian. Inland Revenue shares customer names and contact information with Verian alongside indicators that reflect administrative data Inland Revenue holds. The types of indicators include:

- The tax and social policy products customers are registered for,
- The types of interactions had with Inland Revenue (e.g., inbound phone calls or outbound web messages),
- If the customer has, or does not have, any outstanding tax information (e.g., an outstanding return) or debt in a tax type,
- · Whether the customer is an individual or a business, and
- The customer age, gender and income band.

The purpose of including administrative data is to reduce the need to ask customers questions where the answer is already known.

Verian removes any identifying information from survey responses before they are provided to Inland Revenue. The responses are then analysed together, alongside data Inland Revenue already holds and are only used for research purposes.

<sup>&</sup>lt;sup>1</sup> Your ability to request official information | Ombudsman New Zealand



#### Item 2

Your request for all meeting notes between Inland Revenue and Verian New Zealand is refused under section 18(e) of the OIA, as the document alleged to contain the information requested does not exist or cannot be found.

#### Item 3

Your request for the terms of reference for the contracts between Inland Revenue and Verian New Zealand is withheld under section 9(2)(b)(ii) of the OIA, to protect the commercial position of the person who supplied the information or who is the subject of the information. As required by section 9(1) of the OIA I have considered whether the grounds for withholding the information requested is outweighed by the public interest. In this instance, I do not consider that to be the case.

## Item 4

No recent data breaches have been reported regarding Verian. Inland Revenue has also not received any advice relating to recent data breaches involving Verian.

### Item 5

Inland Revenue provides information to Verian under section 18D of the Tax Administration Act (TAA), which imposes statutory obligations on Verian staff to keep information confidential. Verian staff will commit an offence under the TAA, and be subject to significant penalties, if they improperly disclose information.

#### Item 6

Inland Revenue has not received advice regarding scam emails in the context of any work with Verian.

## Item 7

There are up to two reminder emails sent by Verian to participants, following the initial email invitation.

## Item 8

The survey emails do not state that the survey is anonymous. Verian is able to see when a specific user has clicked on the survey link, and when they have completed it. This is visible to Verian only, which allows them to only send email reminders to those who have not answered the survey.

### Item 9

There are no notifications to any party when a survey email is opened.

### Item 10

There has been no advice received by Inland Revenue regarding voluntary follow ups to government enquiries and the impact of this on people from countries without a tradition of open government.

## Item 11

Inland Revenue's sample and survey data exchanged with Verian is held in overseas servers. Sample data is held temporarily and removed after the interviewing for the month is completed. Non-identifiable survey data is held indefinitely.



#### Item 12

There has been no discussion about linking to a New Zealand government web page regarding the privacy policy in the emails. However, a customised privacy statement is provided for the CX&P survey that outlines how information collected as part of this survey will be used. Inland Revenue's complete privacy policy is available on the Inland Revenue website here: <u>Privacy policy</u>.

#### Item 13

In the 2024–25 financial year, 2,510 responses to the CX&P survey were received from the general public, with an average survey response rate of 4.0%. A total of 4,088 responses were received from customers who had a recent interaction with Inland Revenue, with an average survey response rate of 3.0%.

#### Item 14

A total of 21 queries and complaints have been received by Inland Revenue in relation to the CX&P survey run by Verian between 29 July 2024 and 29 July 2025.

## Right of review

If you disagree with my decision on your OIA request, you have the right to ask the Ombudsman to investigate and review my decision under section 28(3) of the OIA. You can contact the office of the Ombudsman by email at: <a href="mailto:info@ombudsman.parliament.nz">info@ombudsman.parliament.nz</a>.

## **Publishing of OIA response**

We intend to publish our response to your request on Inland Revenue's website (<u>ird.govt.nz</u>) as this information may be of interest to other members of the public. This letter, with your personal details removed, may be published in its entirety. Publishing responses increases the availability of information to the public and is consistent with the OIA's purpose of enabling more effective participation in the making and administration of laws and policies and promoting the accountability of officials.

Thank you again for your request.

Yours sincerely

Patrick O'Doherty

Enterprise Leader, Data, Analytics & Insights

