

## Guidance from the Data Ethics Advisory Group: Population Density Project Pilot – Data Ventures

The Data Ethics Advisory Group is formed of independent experts to provide advice to government agencies on issues relating to data use and innovation. The Group was established in July 2019 with the aim of empowering agencies to use data effectively and innovatively whilst managing risks in order to maintain the trust and confidence of New Zealanders. You can find current details of the Group, its work and its members on the [data.govt.nz](https://data.govt.nz) website.

Thank you for bringing your item before the Data Ethics Advisory Group. It was great to have you with us and we hope you found the discussion valuable. Following the meeting, the Group has agreed on the following feedback.

### **Feedback in summary**

Overall, Group members were of the view that there would be public benefit of the Population Density product. The privacy risks were deemed to be very low since the data have been aggregated in high numbers and employ random rounding. Careful due diligence has been undertaken by Data Ventures to ensure compliance with ethical, privacy and governance standards. Members were reassured by the positive assessment from the Privacy Commissioner.

### **Members were impressed that:**

- This project is adding value for New Zealanders and would contribute to positive social outcomes.
- There are existing and comprehensive agreements made between Data Ventures and pilot users.
- Specific use-cases were requested and the high-standards of data processing specified in the contract were welcomed.
- There was a good balance between granular data and safeguards around anonymity and privacy. They were of the view that it was clear that Data Ventures had been very careful in anonymising and aggregating the data and that this anonymity was guaranteed.
- The data trust model on which Data Ventures is positioned effectively ensures low risk by keeping data largely in situ.
- The highly aggregated nature of data available to Data Ventures had a positive impact on lowering risk.
- Data Ventures had clearly carried out appropriate due diligence, including assessment from the Office of the Privacy Commissioner.
- There is no ability to reverse engineer the data provided to Data Ventures in order to identify individuals at this level of data aggregation.

**Members had concerns that:**

- There is potential for this level of detail to be taken lower (to be more granular) in the future but welcomed the extent of protections in place at present.
- Some demographics (for instance children without mobile phones or those living in low signal areas) would not be present in the data and that this could consequently skew decisions made based on this information.
- New uses of the data, for instance in disaggregating national and international SIM cards, would require aggregation to larger cell numbers to preserve privacy.
- This project was vulnerable to culture change within Data Ventures, were future leadership to seek optimisation of the commercial aspects of this product.

**Members recommend:**

- That the limitations of the data be outlined to ensure that they are front of mind when used for planning, particularly with regard to the likely absence of many children from the dataset.
- That it was important to front foot issues around lack of context for low signal areas.
- That this product not move to meshblock level until privacy and accuracy are assured and that this goes to no further level of detail.
- Combining adjacent SA2 when counts drop below 100 and that consideration be given to this threshold being raised for commercial customers.
- That greater safeguards be built into the licensing and contractual obligations around the data received from telcos as well as for users of the product to protect against unethical exploitation.

**Members noted:**

- That this use of data was already outlined in the telcos' terms of use and that it is possible to opt out of this use with one, but not all, providers.
- That Data Ventures had effectively filled a gap in the market that could otherwise have been filled by more financially-motivated private organisations and were of the view that this was to the public good.
- That it is important that Data Ventures tell the story of the project's benefits and how risks had been mitigated to nurture trust and confidence.

***We look forward to hearing from you in the future***

We know that projects change and evolve. We look forward to having Data Ventures back to the Group to hear how this item is doing and also to renew guidance should this be appropriate. The Group set the threshold for revisiting this item as:

- The moving of data areas from suburb to meshblock level, or
- if this product is made commercially available to the private sector, or
- if multiple new datasets are added to the product.