

Data Ethics Advisory Group

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](#) 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.

Feedback in summary:

The Data Ethics Advisory Group is of the opinion that storing monthly Installation Control Point number (ICP) electricity data in the Integrated Data infrastructure (IDI) would be acceptable. The IDI is a safe space to store data and has the necessary safeguards in place. The public can be reassured that the data will be used for public benefit. We propose working within the normal guidelines of the IDI in adding and linking granular ICP monthly consumption data, but removing identifiable data - in this case ICP numbers and addresses.

If MBIE decides to store more granular detail on this electricity data in the IDI (for example, addresses and daily use), then the Group would like to reconsider its recommendations.

Members were impressed that:

There are opportunities for New Zealand to lead the world in understanding more about energy hardship and develop policies to make a meaningful difference to people.

The Data Ethics Advisory Group would like to commend MBIE on taking this item to the Group so early in the process, while MBIE is still in its formative thinking.

MBIE are planning to do a full Privacy Impact Assessment as this work develops.

Members had concerns that:

The Group is concerned around the granularity of the data that would be added to the IDI and understands it will be monthly ICP data. ICP data is Personal Identifiable Information (PII) data (at the household level) as it directly ties to an address (one or more at each address). ICP identifiers should not be added to the IDI.

The Group understand that electricity providers have concerns about how the data will be treated if it is added to the IDI. While the IDI has strict protocols for access, anonymisation of data for analysis, and disclosure control, once the data is in the IDI, it will be available to be used for a range of other research by IDI users.

Members recommend:

MBIE's preferred approach is to engage with retailers and seek permission to pass this data from the Electricity Authority (EA) to Stats NZ. The Group supports this approach and recommends for the data to be stored in the IDI, as long as the appropriate safeguards are set up. The Group suggests that the energy hardship working group should be established before adding the data to the IDI.

For the data to be really useful in the IDI, it should be linked to the other data in the IDI - which has PII stripped out. Once linked, the ICP numbers should be stripped out. This means that granular linked data is in the IDI, but it is de-identified. Researchers can then analyse the IDI data by itself or in combination with other data, but without access to PII. We propose working within the normal guidelines of the IDI in adding and linking granular ICP monthly consumption data, but removing identifiable data - in this case ICP numbers and addresses. This will maximise the potential benefits and minimize (privacy) risks.

Members noted:

ICP data is effectively data on household level. ICPs and addresses are currently published in a searchable database (individually), ie via the registry hosted on the EAs website. This means that even though the address is effectively published, it is low level usage data.

A privacy impact assessment will be done before adding the data to the IDI.

MBIE also asked for guidance on how it should engage with stakeholders, but the Group did not feel they had enough information to be able to provide advice on this.

We look forward to hearing from you in the future

The Group would like to see you again once the discussion ranges beyond the proposed narrow use of electricity data and would move to wider usage.

Please get in touch with the Group's secretariat should you have any questions about the guidance you have received. We are always delighted to hear from you.

We would also note that the Group reserves the right to extend an invitation to the Minister where they are concerned that their guidance has been misinterpreted or applied in bad faith.