

**From:** [Christie Baird](#)  
**To:** [Carolyn Fyfe](#)  
**Subject:** RE: Background  
**Date:** Wednesday, 4 May 2016 1:38:00 pm

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Hi Carolyn,

Thanks very much for that background information – extremely helpful.

I will let you know how I get on with the OPC.

Thanks

Christie Baird / Privacy Officer / Senior Legal Counsel  
Legal Services Team – Regulatory and Commercial  
Organisational Support

S9(2)(a)

[E @. / W nzta.govt.nz](#)

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**From:** Carolyn Fyfe  
**Sent:** Wednesday, 4 May 2016 12:32 p.m.  
**To:** Christie Baird  
**Cc:** Carolina Lukkien; Leigh Mitchell  
**Subject:** Background

Hi Christie,

Thanks for letting me know about your call from the OPC. Can I please be involved in any conversations about this?

I think a key point is the distinction between access to the CAS **system**, which is not open (as you know people are able to apply for free access, which is assessed against the purpose for which the data is collected); and the data we make openly available from this system. In the data we make publically available we need to make sure we are meeting our obligations under the Privacy Act by ensuring that an individual cannot be identified in the data (ie by factors other than just personal identifiers).

Historically we made unit record information available from CAS in the form of csv files, however these were removed from the web to be replaced with aggregated data as the data in the csv files could potentially allow the identification of an individual.

Some information on correspondence with S9(2)(a)

- Most recent – the email you saw about access
- Update after our phone call – I sent S9(2) a follow-up within the fortnight after our

phone call as agreed, noting we were undertaking a PIA. However, as S9(2) doesn't mention this in his post, I now wonder if he didn't receive this.

- Phone conversation with S9(2)(a) (Chair, Cycle Aware Wellington). To understand their needs primarily, but I also explained about cas access (which S9(2) does not want as he wants to make information about individual crashes available publicly, which would not be allowed under the confidentiality provisions of the agreement) and about identifying information as opposed to identifiers.

Summary from other correspondence:

- S9(2)(a) key points are about usefulness of aggregated data and contesting there are privacy concerns.
- S9(2)(a) notes there are other ways to protect privacy (only specifying an approximate date, or randomising the location slightly, or suppressing the reporting of specific accident codes). These are valid but I think they'd be less useful than aggregation for the majority of users as day/time and precise location are often key. We need to apply consistent rules.
- S9(2) is asking for documents of the 'review' of cas data online and asks why there wasn't consultation – what we said was 'We are currently reviewing the CAS information we have available on our website to make sure it meets our privacy and security standards' –this isn't about consulting, it's about making sure the data conforms to our aggregation rules etc so individuals can't be identified in the data. There isn't a review document.

Hope this helps – let me know if there is more I can provide.

Cheers,

Carolyn

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**From:** Christie Baird  
**Sent:** Wednesday, 4 May 2016 11:57 a.m.  
**To:** Carolyn Fyfe  
**Subject:** Have you seen this?

<http://www.nearimprov.com/cas-saga/>

Christie Baird / Privacy Officer / Senior Legal Counsel  
Legal Services Team – Regulatory and Commercial  
Organisational Support

S9(2)(a)

E @. / W [nzta.govt.nz](http://nzta.govt.nz)  
National Office / Victoria Arcade, 50 Victoria Street,  
Private Bag 6995, Wellington 6141, New Zealand

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