



17 March 2026

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Tēnā koe Joshua,

Your Official Information Act 1982 request, reference OIA 2526-0812

I am responding to your email of 13 December 2025 to the Department of Internal Affairs (the Department) requesting the following under the Official Information Act 1982 (the Act):

1. Device-Based vs. Provider-Based Verification: Any documents outlining the comparative analysis between "Device-Based/OS-Level" verification (using Apple/Google APIs) versus "Provider-Based" verification (requiring platforms like Meta/TikTok to verify users).

Specific interest: I am seeking information on why the "Device-Based" model was rejected or not mandated, given its superior privacy characteristics.
2. Privacy Impact of ID Uploads: Any advice received regarding the privacy risks of the "Provider Liability" model, specifically concerning the likelihood of social media platforms requiring government ID uploads or facial biometrics from New Zealand adults and children to ensure compliance.
3. Australian Consultation: Any correspondence with the Australian Government or eSafety Commissioner regarding the privacy implications of their Online Safety Amendment (Social Media Minimum Age) Bill 2024, specifically regarding the use of third-party identity brokers (e.g., Yoti, k-ID).

Part one and two of the request has been transferred to the Department by Hon Erica Stanford's office. We have already provided a response to this matter. Please refer to previous OIA request, OIA2526-0676 sent to you on 2 February 2026.

On 17 February 2026, you requested clarification on part three with the following:

I am requesting that you specifically query the Digital Safety Team regarding Part 3. Have they had any correspondence with the Australian eSafety Commissioner (Julie Inman Grant) or the Australian Government regarding their recent age verification legislation?

If you continue to refuse Part 3 under section 18(e), please confirm that the Digital Safety Team was specifically consulted on this question and confirmed they hold no records of any kind (including emails) regarding the Australian legislation.

Response to your request

There is one document that is in scope of your request which is attached at **Appendix A**.

Some information in this document is withheld under 9(2)(a) of the Act to protect the privacy of natural persons, including that of deceased natural persons.

Public interest considerations

As is required by section 9(1) of the Act, consideration has been given as to whether the withholding of information is outweighed by other public interest considerations which would make it desirable to make this information available. In this instance, it is not considered to be the case.

Accessing the Ombudsman

You have the right to seek an investigation and review of my decision by the Office of the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Nāku noa, nā

Mark Batt
**Director Branch Performance
Policy and Te Tiriti**



Internal Affairs
Te Tari Taiwhenua

Appendix A: Documents within scope

No.	Title	Date	Decision (Release, partial release or withhold)	Withholding grounds under the Act
1	Email	12 December 2025	Partial release	9(2)(a)