

22 May 2026

File Ref: OIAPR-1274023063-50442

Miss M Quicken

By email: fyi-request-33695-b4c0c0e0@requests.fyi.org.nz

Tēnā koe Miss Quicken

Request for information 2026-209

I refer to your request for information dated 11 February 2026, which was received by Greater Wellington Regional Council (Greater Wellington) on 13 February 2026. You have requested the following:

“Snapper, when tagging on and off indicates whether the user is:

a) Connect

b) Child

c) Normal Adult fare

This is visible to everyone in the bus on either the public transport onboarding or departing the bus.

Please provide the impact assessment that was done re:

a) Privacy

b) Human rights

Around the functional analysis of the Snapper system when both introduced and maintained given the evolution of laws.”

Greater Wellington’s response follows:

Your request has been assessed under the Local Government Official Information and Meetings Act 1987 (the Act).

As noted in our letter dated 14 May 2026 acknowledging your request and our delay in responding to you, we advised we would provide you with any additional information from Snapper regarding your request when we received it. The following response has been provided by Snapper:

“Snapper has not undertaken a formal Privacy or Human Rights Impact Assessment specific to concession notification functionality, either at launch or as a recurring review. The current approach is the product of research carried out during the rollout of the Integrated Bus Ticketing System (IBTS) and our subsequent rail deployment, where we worked to balance privacy considerations against the customer experience as carefully as we could. The resulting designs were reviewed and signed off by Greater Wellington Regional Council.

The rationale for surfacing concession information at the moment of tag-on is to give the customer immediate confirmation that they are receiving the correct concession and being charged the correct fare.

The applied concession is also displayed on the Bus Driver Console and announced audibly at the validator. This is intentional: it enables the driver to request identification where appropriate. Under the conditions of carriage, customers travelling on certain concessions are required to carry valid ID.”

Public transport ticketing systems are designed to ensure customers pay their correct fare. In this case, the general disclosures of a person’s concession type (child or student) are necessary for the bus driver to ensure the correct fare is paid. These requirements are also included in Metlink’s conditions of carriage.

As no impact assessments were done, we are therefore refusing this request under section 17(e) of the Act under the grounds that the document alleged to contain the information requested does not exist.

If a request is likely to be refused under section 17(e) of the Act we must, before the request is refused, consider whether consulting with the person who made the request to assist that person to make the request in a form that would remove the reason for the refusal. In this case we have considered consulting and we don’t believe that it would remove the reason for the refusal.

If you have any concerns with the decision(s) referred to in this letter, you have the right to request an investigation and review by the Ombudsman under section 27(3) of the Act.

Nāku iti noa, nā



Samantha Gain

Kaiwhakahaere Matua Waka-ā-atea | Group Manager Metlink