



21/03/2024

Jim Parsons

fyi-request-25573-84ff61e2@requests.fyi.org.nz

Tēnā koe Jim Parsons

OIA: 1323733 – Further information regarding the Zero Data Service

Thank you for your email of 26 February 2024 to the Ministry of Education (the Ministry) requesting the following information:

One - Can you please provide information about where the zero.govt.nz services are hosted within Azure. For example, are they in a DMZ network, which would be logically isolated from other internal services.

Two - Can you provide a list of all top-level domain names that have been accessed from the zero.govt.nz service in the last 6 months, as well as the number of bytes transmitted/received OR number of requests. To clarify, for top level domain, I would group www.youtube.com under youtube.com, and www.facebook.com or web.facebook.com under facebook.com. If this data is not available in the requested format, then a list of raw domain names and number of bytes or requests would be sufficient.

Three - In regards to the penetration test that you have mentioned has taken place, are you able to provide a brief summary of risks identified. You should be able to provide this information, assuming all risks have been mitigated.

Thank you also for your email of 1 March 2024 in which you declined our invitation to meet and confirmed that you would prefer our response be provided in writing.

Your request has been considered under the Official Information Act 1982 (the Act).

In response to **part one** of your request, Zero Data (the service) systems are hosted in the managed cloud environments of government agencies involved with the service. These cloud environments have several layers of security built into them, including different forms of firewalls and other network security tools.

We are unable to disclose specific information regarding the security controls that safeguard the service. Therefore, we are refusing **part one** of your request under section 18(a) of the Act, by virtue of section 9(2)(k) of the Act, as the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage.



In response to **part two** of your request, we are providing a standard report showing the top 20 top-level domains by their total requests for the period July 2023 to February 2024, inclusive, as **Table One of Appendix A**.

Please note that our standard reporting only includes the top 20 second-level-domains out of the approximately 700 domains noted in the report. To provide a breakdown of the 700 second-level-domains would require the manual processing of a substantial volume of low traffic information and would be a significant administrative task to undertake.

As required by sections 18A and 18B of the Act, we have considered whether extending, charging and/or further consulting with you would enable a more substantive response to be provided. However, we do not consider that any of these mechanisms sufficiently mitigate the significant administrative burden associated with attempting to provide a response.

For these reasons, your request for *all* top-level domain names is therefore refused under section 18(f) of the Act, as the information requested cannot be made available without substantial collation or research.

In response to **part three** of your request, the penetration testing included both web application security testing and white-box host configuration review. We are unable to disclose information regarding the specific risks identified as part of this testing, as the withholding of the information is necessary to prevent the disclosure or use of official information for improper gain or improper advantage. Therefore, we are refusing **part three** of your request under section 18(a) of the Act, by virtue of section 9(2)(k) of the Act.

As required under section 9(1) of the Act, I have considered the public interest in releasing the information withheld. I do not consider the public interest considerations favouring the release of this information are sufficient to outweigh the need to withhold it at this time.

Please note, we may publish this response on our website after five working days. Your name and contact details will be removed.

Thank you again for your email. You have the right to ask an Ombudsman to review my decision on your request, in accordance with section 28 of the Act. You can do this by writing to info@ombudsman.parliament.nz or to Office of the Ombudsman, PO Box 10152, Wellington 6143.

Nāku noa, nā



Stuart Wakefield
Chief Digital Officer
Te Pou Hanganga, Matihiko | Infrastructure and Digital

Appendix A

Table One: A breakdown of the top 20 top-level domains by request number and byte for the Zero Data Service.

Destination	Request ¹	Byte
.education.govt.nz ²	3833208	121305M
.zero.govt.nz ³	3665936	3566420K
<error>	345590	1236543K
.microsoft.com	92994	7016767K
.amazonaws.com	86698	2564877K
.healthpoint.co.nz	71754	8266988K
.plunket.org.nz	34038	9790M
.typekit.net	31186	1299607K
healthify.nz	20450	3291558K
.googleapis.com	14230	366486K
.googletagmanager.com	14140	782307K
.smallsteps.org.nz	9404	903521K
.crazyegg.com	8716	42540490
.google-analytics.com	8454	33625596
staticcdn.co.nz	7412	16066286
.youtube.com	6894	254753K
.facebook.com	5750	12984592
.typography.com	5164	5281304
.justathought.co.nz	4244	120129K
healthed.govt.nz	4208	117255K
other: 700 2nd-level-domains	126882	18653M
Sum	8397352	178943M

¹ This is the Request as defined in HTTP protocol; i.e. every component of a web-page that browser “request” from the servers is counted as one request.

² The significant share of this line is the zero.govt.nz landing site traffic that is hosted on zero.education.govt.nz

³ The large number of requests is reflective of the common components of the zero data service such as the ribbon rendered on top of every page noting the page is delivered via zero data service.