

**From:** [Michelle Beed](#)  
**To:** [Michelle Beed](#)  
**Date:** 2024-06-04 12:53 PM  
**Subject:** Official Information request - Email redaction and communication plan (20240554)

Kia ora Michelle

Further to Paulina's email, I can confirm that ACC hasn't received any advice from DA regarding email redaction or similar. If you need anything further, or would like to discuss the request, you can call me at the below number.

Ngā mihi

**Web Events**  
Acting DA Manager ACC

**Out of scope**  
Michelle Beed

ACC cares about the environment - please don't print this email unless it is absolutely necessary. Thank you.

**From:** Michelle Beed  
**Subject:** Official Information request - Email redaction and communication plan (20240554)

**Re: DA -> Official Information request - Email redaction and communication plan (20240554)**

Kia ora Michelle

We have also received a similar request from "Zor" via FI.

Just spoke to my senior about this and they will be in touch with you as soon as possible to discuss.

Thank you

**Paulina Buchta, (She/Her)**  
Government Services, ACC

Website: [Julia Clarke](#)  
ACC | Wellington 6111 | New Zealand | [www.acc.co.nz](#)



**He Kaitiaki, He Manaaki,  
Ko Whakarua**  
Accessibility: [Web](#) | [Video](#) | [Audio](#) | [Text](#)

**Original Message**  
**From:** DA -> Michelle Beed  
**Subject:** Official Information request - Email redaction and communication plan (20240554)

**Re: DA -> Government Services (government@acc.co.nz)**  
**Subject:** Official Information request - Email redaction and communication plan

Good morning ACC colleagues,

DA has received the below and we are not sure what this person is referring to. Can you advise whether you have received any agency advice from DA regarding email redaction or similar, and if so, who you received this from?

Many thanks,

Michelle Beed (she/her)  
Lead Advisor Official Correspondence | Information Management and Privacy  
He Ringa Manaaki | Workplace Services Group  
Te Tari Kaitiaki | Department of Internal Affairs

Level 4, 45 Pipitea Street, Wellington 6140, New Zealand | [Website](#) | [Facebook](#) | [Twitter](#) | [LinkedIn](#) | [Instagram](#)

-----Original Message-----  
From: DA -> Michelle Beed  
Sent: Tuesday, June 4, 2024 12:53 PM  
To: DA -> Michelle Beed  
Subject: Official Information request - Email redaction and communication plan

[You don't often get email from Michelle Beed <Michelle.Beed@acc.co.nz>. Learn why this is important at [https://aka.ms/whythisemailaddressisimportant](#)]

Dear Department of Internal Affairs,

I am seeking clarification regarding the position of the Department of Internal Affairs and their advice to NZ government agencies, regarding "communication plans" which include "email redaction".

In ACC's response G201-020208 (20/08/2020), Suite Head Manager Official Information Act Services, stated:  
"Redaction of emails, outside of a communication plan, may occur."

In ACC's response G201-020873 (19/08/2023), Sara Freitag, Acting Manager Official Information Act Services, wrote:  
"ACC's Communication Plan Policy was approved in December 2022. This policy is a formal document outlining the process undertaken if client's behaviour or communication is unreasonable, this process includes email redaction"

ACC's Communication Plan Policy v2.0 states:  
"The restrictions that can be placed on a client are the same as those outlined by the Ombudsman in Managing unreasonable complainant conduct practice manual."

In ACC's response G201-020944 (15/02/2023), Sara Freitag, Manager Official Information Act Services, wrote:  
"We currently have a total of 17 mail flow rules for email redaction purposes."

In ACC's response G201-020710 (20/01/2024), Jason Hooper, Acting Manager Official Information Act Services, wrote:  
"ACC has 25 client email addresses subject to email redaction. These email addresses are either linked to at least one client in EOS or are not linked to a client in EOS but we have otherwise determined are emails used by clients. Some of these may also be linked to non-client records. We have identified a further nine email addresses subject to email redaction, which were previously linked to a client in EOS."

I can find no mention of "email redaction" in the Ombudsman's manual, only references to email blocking or forwarding (both legitimate and lawful). The comment on p.100 could be loosely interpreted as "email forwarding", but then Chapter 20 starts with "What if access cannot be restricted or we have contributed to the problem?"

I request documents, reports, advice, or any other information that describe the Department of Internal Affairs' understanding of:  
(a) the meaning of "email redaction";  
(b) when "email redaction" is to be implemented as part of a communication plan;

(c) how "email redaction" is to be implemented.

Please specify whether the "email redaction" should:  
(a) occur during transit, that is the email is redacted to an unintended person at an email server and before reaching the intended recipient; or  
(b) occur after the intended recipient received the email, which requires either the intended recipient to open and forward the email manually, or the intended recipient sets up a rule so that the email is forwarded to a person that they designate.

To clarify, in response to all of the applicant's emails are redacted to an unintended recipient, including all emails sent to the general complaint team inbox. That is, not one communication is ever received by the intended recipient. However, in capacity (b), the intended recipient receives the communication, but then the intended recipient chooses whom to forward the message to (See their message).

I request the list of documents which informed the Department of Internal Affairs' advice and the discussion paper as to how restriction of complainant communications is consistent with obligations imposed under the OIA, Privacy Act, NZBORA, and any other legislation that confers rights of freedom of expression (seeking, obtaining, and disseminating information).

Please specify whether the extreme steps of restricting communications is applicable when the complainant has legitimate complaints, which are not being addressed in accordance with the law, and when the complainant has not been violent or abusive, but has only been persistent expressed frustration or has been simply annoying.

Thanks  
Joe

This is an Official Information request made via the FI website.

Please use the email address for all replies to this request:  
[Michelle.Beed@acc.co.nz](mailto:Michelle.Beed@acc.co.nz)

If you email me as the wrong address for Official Information requests to Department of Internal Affairs? If so, please contact us using this form:  
<https://www.officialinformation.com/submit-request/>

**Disclaimer:** This message and any reply that you make will be published on the internet. Our privacy and copyright policies:  
<https://www.officialinformation.com/submit-request/>

If you find this service useful as an Official Information officer, please ask your web manager to link to us from your organization's OIA or LGDAMA page.

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