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23 July 2024

Mason Helm

By email: fyi-request-27453-3580b91d@requests.fyi.org.nz
Ref: H2024045451

Tēnā koe Mason

Response to your request for official information

Thank you for your request under the Official Information Act 1982 (the Act) to the Ministry of Health – Manatū Hauora (the Ministry) on 1 July 2024 for information regarding Privacy Impact Assessments. You requested:

“The PIA that considered the privacy implications of NHI numbers or other unique identifier. It is my understanding that a PIA took place in the 1990's and concluded that NHI numbers are personal information. There may be something more recent.”

The document you have requested is attached to this letter and is released to you in full.

Please note that the Health Information Code 2020 (the Code) now specifically references the National Health Index number in rule 13(3) and expressly authorises use of the NHI and the agencies that may use it (keeping use of the NHI within the health sector) so there is no longer a need for a specific PIA, as it is now an authorised use.

The NHI itself can fall within clause 4(1)(e) of the Code and is usually treated in a similar way to other health information when it comes to consideration of the rules (although it is considered privacy enhancing in some settings to use the NHI rather than a name as it is a less direct method of identification).

I trust this information fulfils your request. If you wish to discuss any aspect of your request with us, including this decision, please feel free to contact the OIA Services Team on: oiagr@health.govt.nz.

Under section 28(3) of the Act, you have the right to ask the Ombudsman to review any decisions made under this request. The Ombudsman may be contacted by email at: info@ombudsman.parliament.nz or by calling 0800 802 602.

Please note that this response, with your personal details removed, may be published on the Manatū Hauora website at: www.health.govt.nz/about-ministry/information-releases/responses-official-information-act-requests.

Nāku noa, nā

A handwritten signature in blue ink, appearing to be 'Phil Knipe', written over a light blue grid background.

Phil Knipe
Chief Privacy Officer
Government and Executive Services | Te Pou Whakatere Kāwanatanga