

2 December 2024

Del Robinson
fyi-request-29050-538832f8@requests.fyi.org.nz

REF: OIA-16847

Dear Del

Request made under the Official Information Act 1982

Thank you for your email of 4 November 2024 requesting the following information under the Official Information Act 1982 (the Act):

This request is for correspondence and documents related to what NZTA terms "Grey" data items in the CAS Crash data and their removal from the Open Data sets that NZTA publishes.

The fields: Crash factor, crash cause, exact time of crash, day of week, fault, exact date of crash and movement code.

1. *The original decision to remove the fields in 2016 I request the correspondence and documents regarding any and all decisions pertaining to the 2016 change to the open data csv files regarding not publishing "Grey" data items in the revised Open Data, [with respect to those data that were produced in the existing Open Data CSV files before that time].*

Please find attached a copy of the schedule of changes made for CAS Open Data, Attachment 1 - OIA-16847 – CAS Open Data Schedule of Changes.pdf. The pdf attached shows the timeline set to remove 'grey' data items in the CAS crash data base.

Discussions in 2016 around the removal of grey data fields are enclosed in Attachment 2 - OIA-16847_Background.pdf. Please note that no formal review was undertaken, and the removal of grey data fields came as a result of gradual continuous improvements.

Please note that certain information has been withheld under section 9(2)(a) of the Act. This section allows for the withholding of information to protect the privacy of natural persons, including that of a deceased natural person.

2. The review in 2018/2019

I request the correspondence and documents regarding the review and assessment of "Grey" data items, and the decision to not include them in the Open Data in 2018/2019

Please find attached, Attachment 3- OIA-16847 – CAS Open Data Additions for Privacy Assessments.pdf, providing information on the review of removing grey data. Please note that this pdf is an outline of a short schedule of suggested changes that was only in draft format.

In addition to the above document, a risk assessment of the removal of grey data items was prepared by Christie Baird (Senior Legal Counsel). This is being withheld in full under section 9(2)(h) as the withholding of that information is necessary to maintain legal professional privilege.

3. Complaints about Grey data items by the public prior to 2016 I request the number of Correspondence from the public to NZTA complaining about confidentiality in Crash Open Data prior to 2016 that pertained to those Grey data items that were removed. These should be grouped by year and reason stated In the case of there being no such records, this should also be reported.

A preliminary search of NZ Transport Agency Waka Kotahi (NZTA)'s records has provided one result of a complaint from August 2024 which was forwarded from the Minister of Transport's Office to NZTA.

To ensure that we are providing all information in scope of your request, NZTA also undertook an email sweep of all inboxes from the period of 25 December 2006 to 25 December 2016.

In the sweep, we used the search terms, "Complaint" & "Grey Data" & ("Confidentiality" or "Privacy" or "Remove"). The results of the email sweep returned over 63,000 emails using the keyword search suggested.

A second sweep was undertaken using more direct keyword pairings, "Complaint" & "Grey data" & "Confidential" & "Privacy" & "Remove" & ("CAS" or "open data"). However, we were still unable to reduce the results to a manageable level. As such, I am refusing this part of your request under section 18(f) of the Act as the information requested cannot be made available without substantial collation or research.

Under section 28 of the Act, you have the right to ask the Ombudsman to review my decision to withhold information and refuse part of your request. The contact details for the Ombudsman can be located at www.ombudsman.parliament.nz.

With respect to the information that has been withheld, I do not consider there are any other factors which would render it desirable, in the public interest, to make the information available.

If you would like to discuss this reply with NZTA, please contact Ministerial Services, by email to official.correspondence@nzta.govt.nz

Yours sincerely



Justin Taylor
Chief Technology Officer