



Te Tira Tiaki
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10 March 2025

William Foster
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Tēnā koe William,

Official Information Act request

Thank you for your Official Information Act 1982 (OIA) request of 19 November 2024 to the Government Communications Security Bureau (GCSB) seeking information about the security risk of online voting. Specifically, you asked for:

- *Any advice [the GCSB] have given since 2019 to the public or local or national agencies on the security implications or risks of online voting.*
- *Do you have any current assessment of those security risks and, if so, can you provide it to assist current discussions?*

You were advised on 12 December 2024 that the time limit for responding to your request had been extended to 5 February 2025 because the consultations necessary to make a decision on your request were such that a proper response could not reasonably be made within the original time limit.

I apologise that we did not meet the extended deadline.

Background

The GCSB's National Cyber Security Centre (NCSC) is the New Zealand Government's lead operational cyber security agency. Cyber security is a complex and evolving area. We recognise the legitimate democratic interest in online voting and the potential accessibility advantages it may bring. However, a move to online voting would expose our elections to greater risk from malicious cyber actors with a range of motivations. Implementation of online voting for national or local elections would require significant uplift in cyber security measures to ensure there was sufficient cyber security resilience to protect both democracy and confidence in our democratic systems.

Response

There are six documents in-scope of your request. The following four documents are attached.

- An NCSC internal record of meeting from a 7 November 2019 meeting with Auckland City Council and the Department of Internal Affairs about online voting. Please note, this was written after the meeting for internal purposes and was not checked with other meeting participants at the time, so it should not be considered as formal minutes of the meeting.

- GCSB comments on the Government response to the Justice Committee elections inquiry. These were sent to the Ministry of Justice on 27 January 2020.
- The NCSC's response to a draft paper, Report of the Justice Committee Inquiry into the 2022 Local Election, dated 16 February 2023.
- NCSC planning for a May 2023 presentation to Taituara (Local Government Professionals' Elections Reference Group) regarding online voting in local elections.

Some information has been withheld from these documents under the following grounds of the OIA:

- Section 6(a), where the making available of the information would be likely to prejudice the security or defence of New Zealand or the international relations of the Government of New Zealand;
- Section 9(2)(ba)(i), where withholding the information is necessary to protect information which is subject to an obligation of confidence, where the making available of the information would be likely to prejudice the supply of similar information, or information from the same source, and it is in the public interest that such information should continue to be supplied.
- Section 9(2)(g)(i), where withholding the information is necessary to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between employees of any public service agency or organisation in the course of their duty.

Where section 9 grounds have been applied I do not consider the public interest outweighs the section 9 considerations.

I am refusing your request for the remaining two documents under section 18(d) of the OIA, on the grounds the information is publicly available. These are:

- Director-General remarks to the Justice Select Committee Inquiry into the 2017 General Election and 2016 Local Elections, which can be accessed at <https://www.gcsb.govt.nz/news/director-general-remarks-select-committee-inquiry-into-the-2017-general-election-and-2016-local-elections>
- Director-General statement of position for Local Government NZ task force on local electoral reform, which can be accessed on page 16 of https://d1pepq1a2249p5.cloudfront.net/media/documents/ERWG_Issues_Paper_final.pdf

Review

If you would like to discuss this response with us, please feel free to contact information@gcsb.govt.nz.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that the GCSB proactively publishes OIA responses in accordance with the expectations of Te Kawa Mataaho/the Public Service Commission. We intend to publish this letter (with your personal information removed) and enclosed documents on the GCSB website. Publication of such responses is done on a quarterly basis.

Ngā mihi

A handwritten signature in blue ink, appearing to read 'A. Clark', written in a cursive style.

Andrew Clark

Te Tumu Whakarae mō Te Tira Tiaki
Director-General, GCSB