Te Whatu Ora - Health New Zealand

My Health Record Web App

Privacy Impact Assessment

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The Project

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Version number:	3.0

Summary of Project / Change

Please describe the project (or change) clearly and simply. Be sure to set out:

- what the project (or change) will offer and whether it provides a solution to an existing problem

- what are the benefits and the outcomes?

- an overview of what personal information is handled by the project, how it will be collected, why is it needed, where it will be stored, who has access to it?

Write the Assessment as though the individuals about whom the information relates are your audience.

Privacy Impact Assessment (PIA) Scope

This Privacy Impact Assessment (PIA) reviews My Heath Record - the secure self-service web application for personal health information including COVID-19 services.

The scope of this Privacy Impact Assessment is to review and approve the changes in the existing PIA for My Health Record (previously known as Records.health.nz). Compared to the previously approved PIA, My Health Record is now extended to include all the Covid-19 features from My Covid Record with the plans to eventually decommission My Covid Record. This PIA is a combined PIA of previously approved My Health Record and My Covid Record PIAs.

The Project

A new web application called **My Health Record** has been developed to provide accessible and actionable personal health information for individuals and whānau enabling them to manage their health information to achieve better health outcomes. My Health Record is developed as a strategic solution to initially provide immunisation records for individuals and their children and eventually replace My Covid Record (MCR) when existing functionality from MCR for COVID-19 vaccination and tests are made available in My Health Record. In the future, My Health Record will be extended to provide additional personal health information based on core public health service offerings.

In general, My Health Record does not store personal health data. It displays personal health information relating to an authenticated consumer, fetched on-demand from source-of-truth systems through an interoperable integration layer.

My Health Record will be launched live in December 2023, having been in a closed Beta release since April 2023 (accessible only to Te Whatu Ora staff). MCR features (International travel certificates, view COVID-

19 test results, and self-report a RAT result) will be migrated to My Health Record for the November release. MCR website will be de-commissioned soon after My Health Record is released.

My Health Record development is currently contracted to vendors (until permanent development team is in place) and vendor contracts are based on All-of-Government (AoG) contract format or template used across projects/functions as approved.

This My Health Record extension project relates to other data sources, systems and/or tools such as Aotearoa Immunisation Register, Eclair, Google Analytics, etc. (collectively "Others") as detailed below. Each of such Others has or may have its own privacy impact assessment or the like.   If (i) any such privacy assessment is still ongoing; or (ii) privacy issues identified are yet to be resolved/managed at the time when this project goes live, this project team notes or should note that it would be necessary to continue working with relevant colleagues to see how Others' privacy issues (if any) may likely affect this project, and if so, manage any such related or consequential privacy risks as appropriate.

My Health Record Functionality

My Health Record will allow secure access to health consumers who have their identity verified through My Health Account (MHA). The current levels of identification established via My Health Account are Level 1N, Level 2N and Level 3N (also known as confidence levels). Based on the confidence level, a health consumer will have access to limited or full access to My Health Account and My Health Record features.

Consumers must have their identity verified to level 2N or level 3N to access their personal health records via My Health Record. At the 2N level, consumers can access COVID-19 features only and at 3N level, full access to My Health Record features is provided. A detailed view of My Health Account privacy impacts and functionality is covered in the My Health Account Privacy Impact Assessment.

The key features available for health consumers after the initial public release are:

- A consumer can view a list of their own vaccination records that are held in Te Whatu Ora systems (referred to in this document as 'vaccination records').

    o All vaccination records are displayed for 3N level identity verified consumers.

    o Vaccination records are limited to COVID-19 for 2N level identity verified consumers.

- A consumer can view vaccination records of their children under the age of 12 (if identity verified at 3N level and parental relationship has been established through MHA – *see below*).

- A consumer can request a PDF copy of vaccination records to be emailed to them:

    o A consumer verified at Level 3N can request a copy of all vaccination records or COVID-19 only vaccination records.

    o A consumer verified at Level 3N with children linked through My Health Account can request a copy of all vaccination records, or COVID-19 only vaccination records, for their linked children.

    o A consumer verified at Level 2N can request a copy of COVID-19 vaccinations (replicating existing equivalent functionality in My Covid Record).

- A consumer can view their own COVID-19 test result records within the previous 12 months.

- A consumer can upload their own COVID-19 Rapid Antigen Test (RAT) results or upload the results on behalf of another person.

- A consumer can request an International Travel Vaccination Certificate (for COVID-19) for themselves or on behalf of another person.

- A consumer can request to have their personal information updated or request a copy of health records via a Jira Service Management (JSM) form (*see below*). The requests are processed by the Te Whatu Ora Contact Centre.

Signing up with My Health Account and accessing My Health Record are voluntary for health consumers. If an individual chooses not to have a My Health Account, then they cannot access My Health Record. The alternative way for such individuals to access their personal health information is through assisted channels or their primary healthcare provider. My Health Record provides the contact information to do this in the contact us page.

Please see **appendix 3** for consumer access diagram and designs for My Health Record.

My Health Account (MHA)

My Health Record integrates with MHA. By way of background:

- To access My Health Record, an individual must log in or sign up with MHA.

- Access to health records and other functionality within My Health Record is determined by the individual's Identification Level within MHA. The current levels of identification established via MHA are Level 1N, Level 2N and Level 3N.

- Level 1N consumer identification will not allow any health information to be accessed.

- Limited functionality will be available to those consumers with Level 2N, which includes the existing COVID-19 functionality available via COVID-19 website.

- All functionality available within My Health Record will be available to those individuals with Level 3N identification, and they will also have the option to utilise the 'Add a child' feature where appropriate (detailed below).

- Information about Level 3N identification within MHA can be found in the My Health Account privacy statement (https://www.tewhatuora.govt.nz/our-health-system/digital-health/my-health-account/privacy-statement).

- Where an individual has a 3N level of identification confirmed via MHA, it is possible for parental relationships to be established using the 'Add a child' feature in MHA. The ability to add a child is limited to children under the age of 12 and where the identity and relationship can be determined. Currently only NZ born children with NZ birth certificates can be verified in this way. My Health Record will utilise those verified parental relationships within MHA to enable individuals to view their children's vaccination records within their My Health Record account.

- To view all vaccination records within My Health Record, an individual must have Level 3N identification. At Level 2N identification, only COVID-19 vaccination records and features are accessible.

Accessing Vaccination Information

My Health Record pulls an individual's vaccination history from Aotearoa Immunisation Register (AIR) in order to display it to the consumer.

My Health Record does not separately store this information.

The new AIR programme will go live in December 2023 introducing the **Immunisation Source of Truth** (ImmSoT) which is a consolidated data repository for existing Covid Immunisation Register (CIR), National Immunisation Register, (NIR), and Aotearoa Immunisation Register (AIR) data. My Health Record is connecting to the Immunisation Service (ImmSoT API) to pull immunisation records.

Accessing COVID-19 Test Results

My Health Record pulls an individual's COVID-19 test results from Éclair to display to the individual.

My Health Record does not separately store this information.

Benefits of the project

My Health Record provides the health consumer a self-service platform to access their health records in one place using a verified user login. Where a parental relationship is established, users can also view the records of their children under the age of 12, simplifying access to family records.

My Health Record will be a great benefit to people who aren't offered an online service through their GP practice. . The current process to access these records requires the health consumer to contact their GP directly or call up a health call centre for their records, which can prove costly, and records may be incomplete.

In the future, My Health Record will incorporate further health records information and features, helping consolidate health consumers' data in one place supporting them to achieve better health outcomes.

While My Health Record will show many sources of information, it will not separately store this information, and it will not proactively fetch information about people who have not used the service.

Collection and handling of personal information

My Health Record:

- Does not collect vaccination information directly from the individual to display it on the portal. Vaccination records are pulled from AIR at the time the consumer accesses the service.

- Does not collect log in details from the individual. The individual can only sign up and log in to My Health Record via their MHA. The parental relationship is also established through MHA.

- Refers users to JSM Forms that collect personal information if they wish to update personal or missing details. This information is not stored in My Health Record. All JSM form submissions will be stored in Atlassian Jira Service Management queues to be processed by assisted channels. The personal information collected will be used to identify the person and further engagement with the person to provide them a service via the assisted channel. There is a separate privacy impact assessment for the Atlassian Jira Service Management platform.

- Does not collect COVID-19 historical test results directly from the individual to display it on the portal. Historical (within past 12 months) COVID-19 test results are pulled from Éclair at the time the consumer accesses the service.

- Will collect, but not store, personal information where the individual wishes to report a COVID-19 RAT test result – for themselves or on behalf of someone else with appropriate authority. This will be collected via an online form and submitted by the user. For the logged in user, no additional information is collected other than the test results as the personal information is already available in My Health Record to verify the person. When submitting a RAT result on behalf of someone else, the personal information collected includes name, date of birth, NHI number, and mobile

number to identify the individual and submit relevant test result details. My Health Record doesn't store any of the personal information or test results. RAT test results are sent to Éclair and other COVID-19 systems and managed in accordance with existing health sector patterns. See **Appendix 4** and further information below in the **Information Flow Diagram**, and in **Principle 1.**

- Will collect personal information where the individual wishes to request a copy of their vaccination history or a copy of their linked child's vaccination history. We collect the individual's email address to send a PDF copy of their records. The individual's email address is not stored in My Health Record.

- Will collect personal information where the individual wishes to have an International Travel Vaccination Certificate generated and emailed to them for themselves or on behalf of someone else with the appropriate authority. This will be collected via an online form and the request submitted by the user. Information is collected that is required to identify the individual, to match their COVID-19 immunisation records, and to provide the certificate to be sent by email. The individual's email address is not stored in My Health Record.

- See **Appendix 5** and further information below in the **Information Flow Diagram,** and in **Principle 1.**


JSM Forms

The forms for My Health Record will replicate, and eventually replace, those for COVID-19 for:

1. "update your information" - Updating your information - COVID-19 Support - Jira Service Management (atlassian.net)

2. "general enquiry"- Make a general enquiry - COVID-19 Support - Jira Service Management (atlassian.net)

3. "provide feedback about the website" - Provide your feedback about the website - Records.health.nz support - Jira Service Management (atlassian.net)

4. "request a copy of COVID-19 vaccination records" - Request a copy of your COVID-19 vaccination record - COVID-19 Support - Jira Service Management (atlassian.net)

5. "request an international travel certificate" - Request an International Travel Vaccination Certificate - COVID-19 Support - Jira Service Management (atlassian.net)

6. "submit overseas vaccine information" - Submit overseas vaccine information - COVID-19 Support - Jira Service Management (atlassian.net).

Information Flow Diagram

Please insert a diagram (*if available from project documentation*) showing the end-to-end information flows relevant to this project.

Consumer Flow
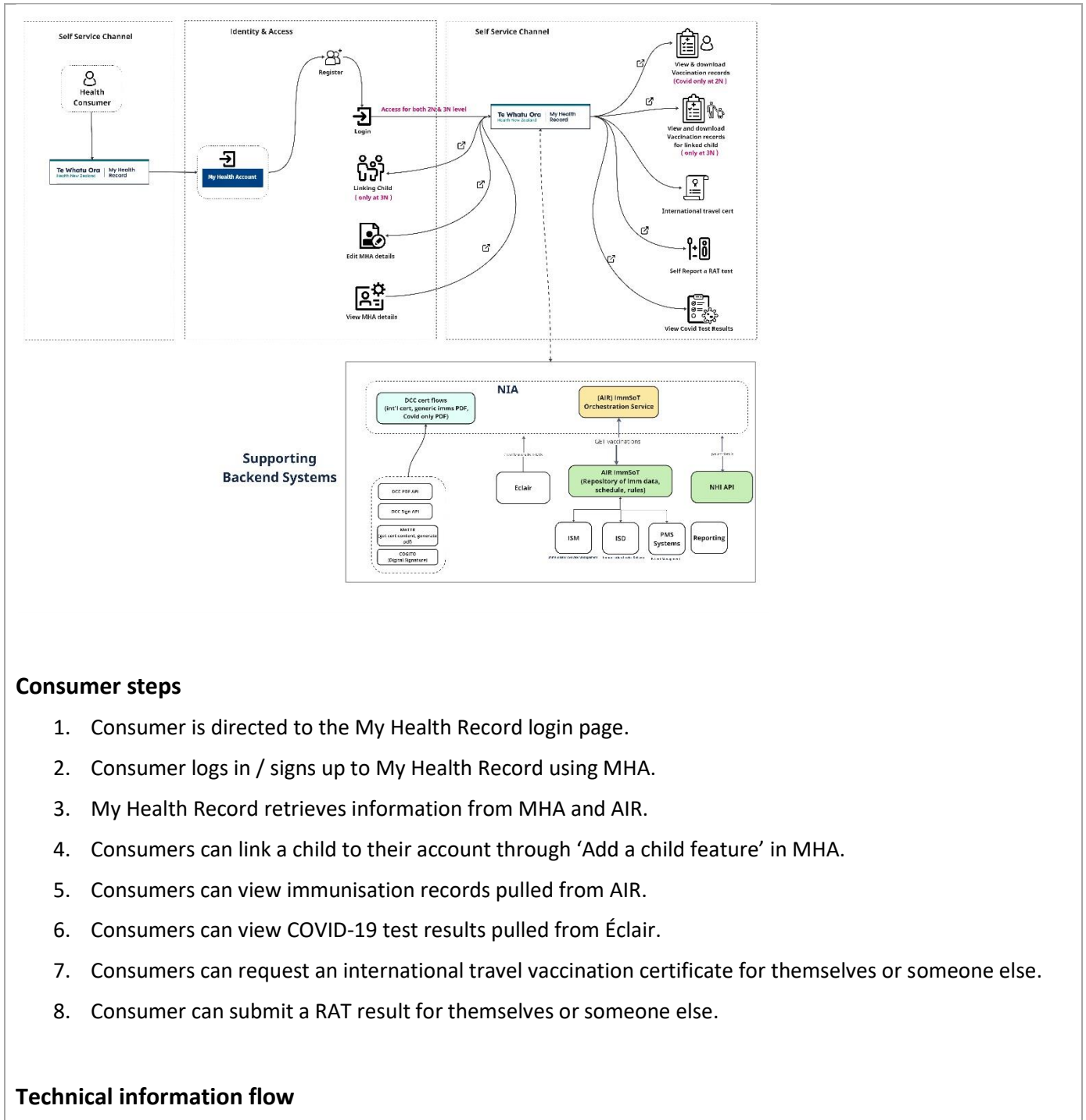
Consumer steps

1. Consumer is directed to the My Health Record login page.

2. Consumer logs in / signs up to My Health Record using MHA.

3. My Health Record retrieves information from MHA and AIR.

4. Consumers can link a child to their account through 'Add a child feature' in MHA.

5. Consumers can view immunisation records pulled from AIR.

6. Consumers can view COVID-19 test results pulled from Éclair.

7. Consumers can request an international travel vaccination certificate for themselves or someone else.

8. Consumer can submit a RAT result for themselves or someone else.

Technical information flow
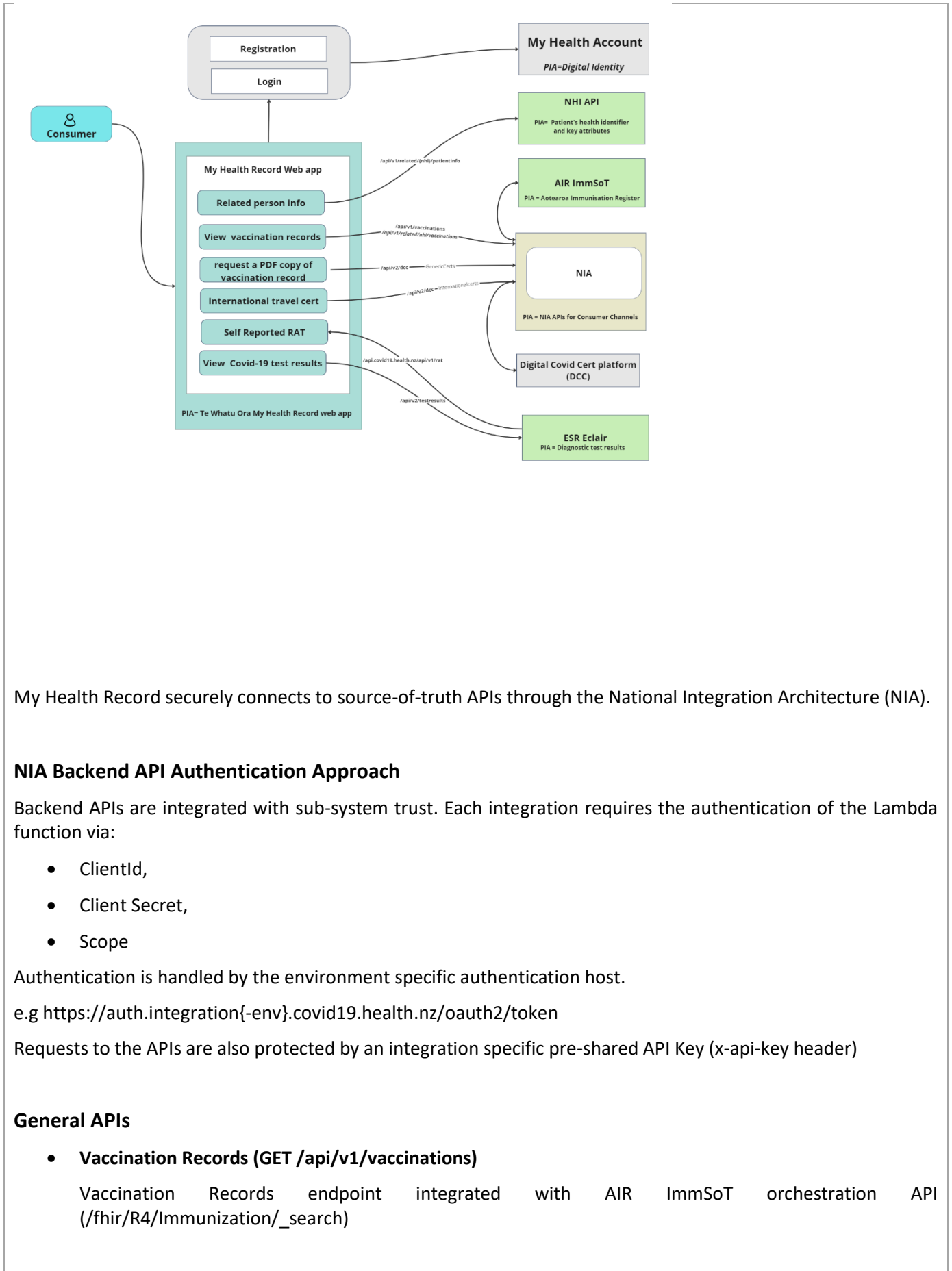
My Health Record securely connects to source-of-truth APIs through the National Integration Architecture (NIA).

NIA Backend API Authentication Approach

Backend APIs are integrated with sub-system trust. Each integration requires the authentication of the Lambda function via:

- ClientId,
- Client Secret,
- Scope

Authentication is handled by the environment specific authentication host.

e.g https://auth.integration{-env}.covid19.health.nz/oauth2/token

Requests to the APIs are also protected by an integration specific pre-shared API Key (x-api-key header)

General APIs

- **Vaccination Records (GET /api/v1/vaccinations)**

  Vaccination Records endpoint integrated with AIR ImmSoT orchestration API (/fhir/R4/Immunization/_search)

Child immunisation records

The following APIs support the fetching of data provided by the list of NHIs returned via the "urn:login:health:nz:claims:relationships_parentchild_list" claim from MHA.

- *Get Related Person Info (GET /api/v1/related/{nhi}/patientinfo)*

    This API utilises the existing NHI FHIR API endpoint (*https://api.hip-uat.digital.health.nz/fhir/nhi/v1*) to retrieve Patient Names and DOB information by NHI. The {nhi} parameter is checked with list of NHIs provided by the "urn:login:health:nz:claims:relationships_parentchild_list" claim, to ensure the user is related to the nhi and is authorised to access this information.

    This API is required as the My Health Claim does not provide any patient information associated with the supplied NHI numbers.

- *Get Related Person Vaccination Records (GET /api/v1/related/{nhi}/vaccinations)*

    This API returns the vaccination record for the supplied {nhi} parameter. This API fetches data from the AIR ImmSoT via AIR Orchestration API. As per above, the {nhi} parameter is validated against the user's claims for authorisation.

    Additionally, the data returned by this endpoint is coded to remove the location information associated with the vaccination record.

Self-Reported RATs (POST https://api.covid19.health.nz/api/v1/rat)

The Self-Reported RAT feature in My Health Record leverages the existing frontend APIs from COVID-19. This endpoint supports a consumer to report on behalf of themselves or on behalf of someone else, based on the POST payload provided by the frontend application. The self-reported RAT data is then sent to data to ESR/Eclair via the POST Diagnostics endpoint.

Get COVID-19 Test Results   (GET /api/v2/testresults)

My Health Record leverages the existing API in COVID-19 for COVID-19 test results. This API returns test results via the ESR DART endpoint. We are querying the same LOINC Codes (Diagnostic Report Codes) to this endpoint (same as COVID-19). This API is a simplified port of the COVID-19 function. This endpoint enforces 2N confidence level authorisation as per existing MCR functionality.

- **Document Generation (PDF) -** (Generate a PDF document of health record as requested by the consumer – provisioned only for vaccination record and international travel certificates for now)
    - **International Travel Certificate**
    - **COVID-19 Vaccination Records**
    - **All immunisation Records**

    To support the document generation capability for the above features, My Health Record API gateway integrates with DCC (Digital Covid Certificate Generation platform) via the following API endpoints
        - /api/v1/related/{nhi}/dcc/request-eligibility (GET)
        - /api/v1/dcc/request-certificate/api/v1/dcc/request-eligibility (GET)
        - /api/v1/dcc/request-certificate-onbehalfof (POST)

- /api/v1/dcc/request-eligibility (POST)

The above endpoints are backed on to the existing DCC endpoints *<NIA>/v2/dcc* and *<NIA>/v2/dcc/rules* and the vaccination data is pulled from AIR immunisation service (ImmSoT) via AIR Orchestration in NIA

Scope of Assessment

Please describe what is in scope of this PIA

This PIA is in relation to the web app *My Health Record*.

- My Health Record web app frontend and backend systems as shown in **Appendix 3.**

- The full AIR solution is not in scope of this PIA. My Health Record integration with AIR is in scope, which includes:

  o Retrieving vaccination history from AIR ImmSoT API using the NHI number of the authenticated user, transmitted by MHA.

  o Retrieving child's vaccination history from AIR ImmSoT API using NHI of children linked to the authenticated user, transmitted by MHA.

- The full scope of the integration platform is not in scope of this PIA. My Health Record integration with digital certificate generation is in scope, which includes:

  o Integration with Digital Covid Certificate generation platform provided by MATTR and Cogito, including verifiable international COVID-19 certificates.

  o Provision of PDF downloads of vaccination records.

- The full ESR Éclair system is not in scope of this PIA. My Health Record integration with ESR Eclair is in scope, which includes:

  o Submitting self-reported COVID-19 RAT results.

  o Retrieving COVID-19 test results.

Please describe what has been excluded from the scope of this PIA and why

My Health Account

As above, My Health Record integrates with MHA.

The privacy impacts for MHA are addressed in its own PIA, found here- *My Health Account PIA documentation.*

The integrations between MHA and My Health Record are also out of scope of this PIA.

AIR

My Health Record pulls an individual's vaccination records from AIR ImmSoT to display vaccination records on My Health Record.

The privacy impacts for AIR are addressed in its own PIA.

Éclair

My Health Record submits self-reported RATs to ESR Eclair and also pulls Covid-19 test results from Eclair to display in the front end. Éclair is subject to its own Privacy Impact Assessment. The My Health Record PIA is made on the basis that Éclair is operating in accordance with its own individual PIA.

JSM Forms

When an individual is logged into My Health Record, from the landing page they can:
- make an enquiry.
- request to update their information.
- provide feedback about the website.
- request an international travel vaccination certificate.
- request a COVID-19 vaccination record.

To do this the individual is taken to a JSM form.

A Privacy Impact Assessment for the use of personal information in JSM has been completed -

HNZ PIA for use of
PII in JSM.pdf

Appendices

To finalise this PIA you may need to provide your privacy officer with supplementary documents (*e.g. a draft Privacy Statement, Information Sharing Agreement, Cloud Risk Assessment*). You can include these supplementary documents as **appendices** to this PIA.

If you have **added appendices** to this PIA, please list them here:

Appendices	Information
Appendix 1	Risk and Mitigation Table
Appendix 2	Glossary
Appendix 3	Visual designs
Appendix 4	Self-Report a RAT forms
Appendix 5	Request an International Travel Vaccination Certificate
Appendix 6	JIRA service management forms
Appendix 7	Proposed privacy statement – My Health Record

Assessment Questions

Does the project involve personal information?	YES	NO
	☒	☐

If you're unsure what personal information is, please see the guidance document for more information. For the purpose of this question, "*involve*" includes to collect, store, use, and/or disclose personal information.

- If the answer is '**No'** then there is no need to continue with this PIA. You **must** still complete a brief Privacy Analysis/ Threshold PIA and email this to your Privacy Officer for approval.
- If the answer is '**Yes'**, please move on to the next section (Health Information).

Does the project involve personal health information?	YES	NO
	☒	☐

The Health Information Privacy Code 2020 applies when a project handles health information. The Privacy Act 2020 applies when the project handles any personal information that is not health information.

If your project does handle health information, as you work through the remaining sections in this PIA you should apply Rules 1 to 13 of the Health Information Privacy Code 2020 as they correspond to the 13 privacy principles.

Principle 1:
Lawful purpose and necessary collection of personal information

Principle 1 of the Privacy Act 2020 states that personal information **should not** be collected by any agency **unless** the information is collected for a **lawful purpose** connected with a function or activity of the agency, **and** the collection is **necessary** for that purpose.

⚠️ The project should only collect the minimum amount of personal information that is necessary for the relevant function or activity ("data minimisation"). If the project **does not** require identifying information, then we **should not** collect it.

Please complete the following table:

List all information collected by the project	Please state why this information is needed for the purposes of this project
View Vaccination History My Health Record fetches information from MHA and AIR to verify authentication and authorization of a consumer and display vaccination information to them.	My Health Record needs to retrieve this information from MHA and AIR, so that we can show the health consumer their vaccination history. Note: When a parent is looking at adding a child's vaccination history using the "Add a child" link, the

This information is not stored separately by My Health Record. It is fetched on-demand. My Health Record displays: For the primary account holder: • Names • NHI • Vaccination friendly name • Vaccination date • Vaccine type if available • Dose number if available • Manufacturer if available • Batch number if available • Facility the product was administered. Child added by using MHA's "Add a child" feature: • First name • Age • NHI • Vaccination friendly name • Vaccination date • Vaccination type if available	"Facility the product was administered" will be removed.
User preferences If a user has already seen the site walkthrough, information is stored that shows that they should not be seen the site walkthrough again. **Appendix 3** includes the visual dashboard for this new web app.	My Health Record needs to store this information to ensure that a user gets a walkthrough on their initial use of the site and not subsequent uses.
Report a COVID-19 RAT result My Health Record collects, but does not store, information when a COVID-19 RAT test result is recorded for self or on behalf of another person: • Name • Email address • Date of Birth • NHI • Mobile phone number • Covid RAT test result (Positive or Negative) • Date and time of test Where the user is reporting their own result, some of this information is automatically retrieved from MHA information. In the instance of reporting the COVID-19 RAT result on behalf of someone else, all	My Health Record needs to request this information from the individual to establish the COVID-19 test result and to correctly link it to the correct individual for the purposes of auditability and patient healthcare.

the details need to be collected from the user but not stored separately by My Health Record. See **Appendix 4** for screenshots.	

Request an International Travel Vaccination Certificate
 	
My Health Record collects, but does not store, information when an International Travel Vaccination Certificate is requested (for self or on behalf of another person):
 	
  • Name
  • Email address
  • Date of Birth
  • NHI
 	
My Health Record retrieves information based on the above collected information from the Aotearoa Immunisation Register (AIR) and generates a certificate with this information included:
 	
  • Vaccination Product Given
  • Vaccination Date
  • Vaccine Doses
  • Vaccine Series
 	
See **Appendix 5**
	My Health Record needs to request this information from MHA and AIR so that we can establish if the individual is eligible for an International Travel Vaccination Certificate (minimum 2 doses required) and generate the certificate to be sent by email.
	
	When the user requests a certificate for another person, identity information needs to be collected to generate a certificate for the correct person.

Request a copy of vaccination history
 	
My Health Record collects, but does not store, information when a copy of vaccination history is requested (for self or linked children):
 	
This information includes:
 	
  • The scope of the PDF record requested: COVID-19 only or all vaccinations.
  • Email address
 	
My Health Record retrieves information based on the above collected information from the Aotearoa Immunisation Register (AIR) and generates a PDF with this information included:
 	
  • Type of vaccine
  • Vaccine date given
  • Batch number
	My Health Record needs to request this information from the individual to ensure that the PDF record of vaccination contains the right information and is sent to the appropriate email address.

COVID-19 Test Result History My Health Record does not collect information from the consumer for COVID-19 Test Result	My Health Record needs to retrieve this information from MHA and the COVID-19 Test Database (Éclair)

history. It only displays information received by MHA and Éclair. These services have their own PIAs. My Health Record displays Primary account holder • Names • NHI • 12 months history of COVID-19 test results • Test Date • Date of result submitted • Disease Targeted • Test result	so that we can show the health consumer their COVID-19 test history.
Jira Service Management (JSM) Forms Te Whatu Ora will collect personal information about individuals through forms built within JSM. Details of this are covered by the JSM PIA. **Amend or update personal details or COVID-19 vaccine information, where we collect**: • Full name • Email address • Date of birth • NHI • Phone number • Current residential address • Last known residential address in NZ • What COVID-19 immunisation record is missing • Which COVID-19 immunisation record has the wrong date • How a booking was made • Booking confirmation number • When a person was immunised • Where a person was immunised • Other information **To make a general enquiry**, we collect: • Email address We also have a free text field to enable someone to submit their general enquiry. It may be people volunteer additional personal information through the free text fields. **To provide feedback** we are optionally collecting:	This information is required to establish an individual's identity and to act on their request.

- Name, optional - email address, optional - free text fields for feedback **Request a copy of your COVID-19 Vaccination record details** where we collect: - Full name - Date of Birth - NHI - Email - Phone number - Current residential address - Last known residential address **Request an International Travel Vaccination Certificate** where we collect: - Full name - Date of Birth - NHI - Email - Phone number - Current residential address - Last known residential address The information collected through the forms is managed by Te Whatu Ora Contact Centre and where necessary, passed through to existing resolving teams in the organisation using existing processes.	
Google Analytics will be used. The information we collect through Google Analytics will not be identifiable information.	My Health Record collects information through Google Analytics to monitor use of the platform and help Te Whatu Ora to improve the user interfaces of online services offered. This is outlined in the proposed privacy statement in Appendix 5.

Please state the lawful purpose for the collection of this personal information
The purposes for collection of information for MHA and AIR can be found in the respective PIAs and privacy statements. My Health Record is collecting, but not storing, information from the health consumer for the purposes of: Recording a COVID-19 RAT test result. Personal information to confirm identity and to accurately record test result information as per current COVID-19 guidelines.

- Providing an International Travel Vaccination Certificate. As above, personal information to confirm identity to provide certificate and provision for emailing certificate.

- Providing a copy of vaccination history. As above, we require email address to send the PDF to the individual.

- The submission of a JSM form. As above, we require the personal information to confirm someone's identity and action their request.

These collections are for the lawful purposes of providing accessible personal health information so that consumers can choose to engage with to obtain vaccination records and provide COVID-19 related health information about themselves and on behalf of others. Consumers can use that information in a format that will enable them to assert a vaccination status (and test status) to third parties as required.

	YES	NO
Could the project use **aggregated or anonymised data** and still satisfy the project's purpose?	☐	☒
Is the project collecting **the minimum** amount of personal information required for the purpose of the project?	☒	☐

Please provide further information here if you're not using the minimum amount of personal information, or you could use aggregated or anonymised data
N/A

Compliance check with Principle 1

Does the project comply with Principle 1?	YES	NO	UNSURE
The information is collected for a lawful purpose and the collection is necessary for that purpose	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 2).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 1. Once completed, please move on to the next section (Principle 2).

Principle 2:
Collection directly from the individual concerned

Principle 2 of the Privacy Act 2020 requires an agency to collect information **directly** from the individual concerned unless an exception applies.

	YES	NO
Are you **only** collecting personal information **directly** from the individual?	☐	☒

- If you have answered "**Yes**", please move on to the next section (Principle 3).
  If you have answered "**No**", please answer the remaining questions in this section before moving on to the next section

Please state why you're not collecting information directly from the individual
All the information collected is for the lawful purposes of providing accessible personal health information. An identity verified person who is logged into My Health Record can provide their own personal information, but they can also submit personal information on behalf of someone else as explained below.   **Report COVID-19 RAT Test**   My Heath Record allows an individual to report a COVID-19 RAT test result on behalf of someone else if they have authority or permission to do so and have the details of that other person's full name, NHI and date of birth.   This 'on behalf of' functionality allows caregivers such as parents caring for young children, and adults caring for elderly family members who do not have their own MHA to record RAT results on their behalf.   To mitigate the risk of inappropriate requests, the 'on behalf of' process will also contain a warning to the My Health Record user prior to them submitting a RAT test on behalf of another person.   **International Travel Vaccination Certificate**   My Heath Record allows an individual to request this certificate on behalf of another person – if they have authority or permission to do so and have the details of that other person's full name, NHI and date of birth.   This 'on behalf' of service will enable a parent to create a certificate for a child who does not have MHA, or one person with MHA/My Health Record to assist another individual to obtain a certificate with that other person's permission.   To mitigate the risk of inappropriate requests, the 'on behalf of' process will also contain a warning to the My Health Record user prior to them submitting a request for a certificate on behalf of another person.   Note that the ability to request a PDF download of all immunisation records is limited to the authenticated user and children linked to the authenticated user through My Health Account.   The **JSM forms** collect personal information directly from the individual concerned.   The JSM forms have also been designed so that one individual can submit a form on behalf of another individual, such as a parent requesting that their child's details are updated, such as to correct a COVID-19 immunisation record.   A tick box has been added into the form so that the individual submitting the form confirms that are authorised to submit it on behalf of another.   This has also been addressed in the privacy statement.
Please state what legislative exception applies   *The legislative exceptions can be found in* <u>*Principle 2*</u> *of the Privacy Act and* <u>*Rule 2*</u> *of the Health Information Privacy Code. If you're unsure if an exception applies, please contact your Privacy Officer.*
Principle 2(2)(c)- the individual concerned authorises the collection of the information from someone else

Please complete the following table:

What personal information is collected from third parties?	Who is the third party?
N/A	N/A
N/A	N/A

Compliance check with Principle 2

Does the project comply with Principle 2?	YES	NO	UNSURE
Are you collecting directly from the individual concerned (or an exception applies)?	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 3).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 2. Once completed, please move on to the next section (Principle 3).

Principle 3:
Telling the individual what we are doing

Under Principle 3 of the Privacy Act 2020, when an agency collects personal information directly from individuals, there are certain things they **must** do **before** they collect the information or **as soon as practicable** after the information is collected. This includes making sure the individual is aware of:

(a) the **fact** that the agency is collecting personal information

(b) the **purpose** for which the agency is collecting the information

(c) the **intended recipients** of the information

(d) The name and address of the agency that holds the information

(e) the **consequences** (if any) if that individual does not provide that information

(f) whether the collection is **mandatory** or **voluntary**

(g) the **rights of access to, and request correction of,** the information.

There are only **limited circumstances** where we do not need to tell the individual the matters in (a) to (f) above.

	YES	NO
Will the project be telling an individual all the matters in Principle 3?	☒	☐

- If the answer is "**Yes**", please answer the questions in part A to C below only prior to completing the Principle 3 compliance check.
- If the answer is "**No**", please answer the questions in part D below only prior to completing the Principle 3 compliance check.

A. How you're going to tell the individual

> **Please describe** how will you tell the individual how the project will manage their information.
> *For example, will you have a consent form, information leaflet, privacy statement etc?*

Privacy and Consent is highlighted and captured as part of the requests in:

Reporting a COVID-19 RAT test

Privacy and consent

☐ I have read and agree to the **privacy statement**. I consent to receiving COVID-19 communications on this mobile number.

Reporting a RAT without authority is an offence under section 212 of the Privacy Act 2020 and could result in a conviction and a fine.

Requesting an International Travel Vaccination Certificate

Privacy

☐ I have the authority to request a pass or certificate on behalf of this person and have read and agree to the **privacy statement**.

Requesting a pass or certificate without authority is an offence under section 212 of the Privacy Act 2020 and could result in a conviction and a fine.

Send certificate

JSM Forms

contact you if we need to

Read the Records – Health New Zealand privacy statement

I have read the privacy statement and understand how the information I provide will be used. *

☐ Accept and continue

We will have web pages that explain

Privacy statement

Te Whatu Ora | **My Health**
Health New Zealand | **Record**

Home / Privacy statement

Privacy statement

Terms of use

Contact information

Copyright

Privacy statement

My Health Record is a web application owned by Te Whatu Ora – Health New Zealand.

This privacy statement outlines how we may collect and handle your personal information in My Health Record in accordance with the Privacy Act 2020 and Health Information Privacy Code 2020.

We may update this privacy statement from time to time. This privacy statement was last updated on **29 November 2023.**

On this page

About My Health Record

Your personal information

Collection of personal information

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Health New Zealand | **Record**

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Copyright

Terms of use

My Health Record is a service operated by Te Whatu Ora – Health New Zealand that can help you gain secure access to some health information about yourself, and others close to you where that is authorised by our processes.

These terms apply to the entire contents of My Health Record, to any web feeds produced by My Health Record, and to any feedback or submissions provided through My Health Record. By viewing and using My Health Record, you will be deemed to agree to these Terms of use.

On this page

What you are agreeing to

Disclaimer

MHA also has web content that explains the process to consumers

https://www.tewhatuora.govt.nz/our-health-system/digital-health/my-health-account/about/

Please see **Appendix 7** for the privacy statement for the My Health Record web app

Where will the document be made accessible?

For example, will it be published online? Link in an email? Hard copy?

The privacy statement for the My Health Record app will be published on the website and available from the footer menu and can be seen by non-logged in and logged users alike.
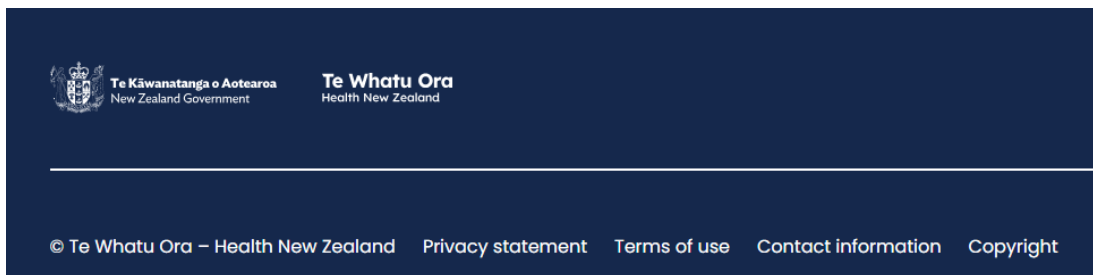
The privacy statement for My Health Record which is found in appendix 7

Please include as an **appendix** a copy of any draft document that outlines how you will manage an individual's personal information.

B. When you're going to tell the individual

Will you tell individuals before or after you have collected their information?
If you're telling the individuals after you have collected their information, how long after?

- Health consumers are advised at the time their information is collected, not after, and they are proactively presented with privacy information at the point of collection.

- MHA also has web content that explains the process to consumers.

    https://www.tewhatuora.govt.nz/our-health-system/digital-health/my-health-account/about/

C. Mandatory or voluntary collection

Please state whether the collection of information is voluntary or mandatory?

Having access to the My Health Record platform is **voluntary.**

- If someone wishes to access the platform, they will need access to MHA. Certain information will be required to have MHA and to achieve either Identification Level 2N or 3N.

- My Health Record pulls vaccination history through from AIR.

- My Health Record pulls COVID-19 test history through from Éclair.

Once within My Health Record, individuals do not need to disclose any personal information unless they want to submit a COVID-19 RAT Test Result, Request an International Travel Vaccination Certificate or submit a JSM form.

Please see **Appendix 4**, **Appendix 5** and **Appendix 6** for details on required fields when submitting these forms.

Please state to what extent, if any, the individual can opt out of providing some or all of their information

The system is entirely voluntary and does not collect information from anyone who does not actively choose to use it.

They will be required to go through the MHA process and get to Identification Level 2N for access to limited datasets and to Identification Level 3N for full access.

Please state what happens if the individual does not want to disclose their information?

If individuals do not want to provide information in MHA to gain Level 3N they will have limited functionality within My Health Record. They will not be able to view personal health records for themselves or their children (accessible records are immunisation only for the initial release).

If individuals do not want to enter details about their COVID-19 RAT test result, then they will not be able to record the test via this app.

If individuals do not want to enter personal details required to retrieve an International Travel Vaccination Certificate, then they will not be able to request one via this app.

If individuals do not want to enter their email address, then they will not be able to receive a copy of their vaccination history for themselves or their linked children.

If individuals do not want to provide personal information in the JSM forms, they may not be able to submit the forms and/or we may not be able to action their requests.

D. Why you're not going to tell the individual

Please state why you're not telling the individual how the project will handle their personal information?

N/A

Please state what legislative exception applies?
The legislative exceptions can be found in Principle 3, *Privacy Act 2020 and* Rule 3, *Health Information Privacy Code 2020*

N/A

Compliance check with Principle 3

Does the project comply with Principle 3?	YES	NO	UNSURE
Are you telling the individual how the project will handle their personal information (either before or as soon as practicable after the information is collected) or an exception applies?	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 4).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 3. Once completed, please move on to the next section (Principle 4).

Principle 4:
Fair and lawful collection of information

Principle 4 requires that when an agency collects information they must do so by lawful means **and** by means that, in the circumstances of the case are fair and not intrusive.

Your method of collection may be unfair it is involves threatening, coercive, or misleading behaviour. What is fair also depends on the circumstances. You **need** to take particular care when collecting information from children and young people or other vulnerable groups. It may not be fair to collect information from children in the same manner as you would from an adult.

Please describe the current proposed method of information collection *If the information is not being collected fairly or lawfully, consider how the collection method could be adapted or modified to meet this Principle 4*
My Health Record collects information voluntarily by a Health Consumer who has decided to use My Health Record and MHA. **Reports a COVID-19 RAT Test result** The RAT test result will be collected through a form with questions in plain English and mandatory fields will be limited to those essential to collecting the required personal information for this purpose. **Requests an International Travel Vaccination Certificate** The International Travel Vaccination Certificate be collected through a form with questions in plain English and mandatory fields will be limited to those essential to collecting the required personal information for this purpose. Only information required to identify the individual and match the NHI to COVID-19 vaccination records is collected. **Request a copy of vaccination history** The individual email address will be collected through a small form in plain English and a mandatory field will be limited to essential required personal information for this purpose.
If you're collecting information from children or young people, **please state** what steps are you taking to address any power imbalance, and to obtain genuine consent for the collection (or authorisation) of their family/whānau?
My Health Record is accessible to users who are eligible for and signed up to MHA. Currently this is limited to adults and children over 12yrs of age. Parents of children under 12yrs of age can access health information on My Health Record on behalf of their child. Details about this can be found on the MHA "Add a child" feature https://www.tewhatuora.govt.nz/our-health-system/digital-health/my-health-account/privacy-statement/. Originally the MHA service was available only to those over 16, but this has been lowered to include those 12 years and over. It is not considered there are any specific issues that need to be considered for this age

group (other than the potential challenges for them locating relevant ID documents to obtain the MHA, and then establish they are the certificate holder if that is required for the 12 to 16 age group). There will be assisted channels available for those that face challenges.

My Health Record also allows users to submit COVID-19 RAT Test Results on behalf of others, including children.

- There is the possibility that a test result is reported for a person who has not authorised that to occur and does not know about it.

- To limit the opportunity for a test result to be entered without permission, details including that person's full name, NHI and date of birth are required.

- The information submitted will be NHI matched and recorded in the Éclair system as a 'self-reported' RAT (to signal it is a consumer upload of the result rather than a supervised clinical process).

- It will be possible to follow an audit trail to find out who reported the RAT result if there was a subsequent question about the validity of the result.

- To further mitigate the risk of inappropriate results, the 'on behalf of' process will also contain a warning to the My Health Record user prior to them reporting a RAT result on behalf of another person.

My Health Record also allows users to request International Travel Vaccination certificates on behalf of others, including children.

- There is the possibility that a certificate could be requested for a person who has not authorised that to occur and does not know about it.

- The certificate generated will however be specific to the person, as they will be named within it. It will have limited use to any other person, particularly if it needs to be compared to an identity document, such as a passport.

- To limit the opportunity for a certificate to be requested without permission, details including the NHI number of the person will be required, as this is unlikely to be widely known.

- The information submitted will be NHI matched and then compared against the Aotearoa Immunisation Register to create the details to generate the certificate for the other person if there is a match.

- It will be possible to follow an audit trail to find out who requested the certificate if there was a subsequent question about the validity of the certificate.

- To further mitigate risk of inappropriate requests, the 'on behalf' of process will also contain a warning to the My Health Record user prior to them submitting a request for a certificate on behalf of another person.

If there are any cultural considerations, how you have assessed this, and, as appropriate, with whom you have consulted about how to ensure you collect the information in a culturally appropriate way

The "Add a child" feature in MHA only allows a person to link a child if they appear in the child's birth certificate. During consultation with Te Aka Whai Ora and communities, feedback has been received on the cultural and equity impacts of limited access for parents who do not fit this model.

Feedback has been passed to the responsible team, My Health Account. Work is planned to improve this feature.

Compliance check with Principle 4

Does the project comply with Principle 4?	YES	NO	UNSURE
Are you collecting information in a lawful manner and by means that are fair and not intrusive?	☒	☐	☐

- If you have answered "**Yes"**, please move on to the next section (Principle 5).
- If you have answered "**No**" and "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 4. Once completed, please move on to the next section (Principle 5).

Principle 5:
Storage and security

Principle 5 of the Privacy Act 2020 requires an agency that holds personal information to ensure that the information is protected by such **security safeguards that are reasonable** in the circumstances to take against loss, access, use, modification, disclosure, or other misuse

A. Cloud Computing Services

	YES	NO
Does your project utilise cloud computing?	☒	☐

- If you have answered "**No**", please move on to "User Controls".
- If you have answered "**Yes**", please answer the remaining questions in this part "A" before moving on to "User Controls".

Please describe the system and location where is the information stored?
The front-end application is built on a secure AWS infrastructure environment, while back-end systems from which data is displayed, are part of the Te Whatu Ora Salesforce platform and ESR Éclair for Covid tests. The project team have engaged Te Whatu Ora security to review the new My Health Record platform. It is a condition of this PIA that the platform doesn't go live until such time as the ATO has been approved and relevant deployment approvals have been obtained to enable the connection between MHA and Records. Further information about the use of cloud computing in JSM can be found in the JSM PIA, including information hosted on the MoH AWS tenancy in Australia.

	YES	NO
Has a Cloud Risk Assessment been completed by your relevant data security team?	☒	☐
Has your relevant data security team said that a Cloud Risk Assessment is not required for your project?	☐	☒
Has a Security Risk Assessment been completed by your relevant data security team?	☒	☐
Has your relevant data security team said that a Security Risk Assessment is not required for your project?	☐	☒

Comments: *if you are working with information security but CRA/SRA have not yet been completed, please add relevant detail here*

Please contact your data security team for more information and support. Note that Cloud Risk Assessment and Security Risk Assessment may be completed concurrently with the PIA.

B. Access to Information

Please describe the roles that will have access to the personal information
The consumer facing application displays private information to the individual consumer themselves.

The information provided by consumers for reporting a COVID-19 RAT test result can be accessed by the authorised users of the following systems in accordance with current clinical directives for handling of COVID-19 test results:

Éclair, Episurv, Salesforce (NCTS/NDMS), CCCM, GP's PMS - these teams have existing processes to handle enquiries containing personal information and are governed by their own PIAs.

The information provided by consumers via the JSM forms is accessed by the Te Whatu Ora Contact Centre and resolving teams. These teams have existing processes to handle enquiries containing personal information. |

Please describe why these roles need access to the personal information
N/A

Please describe how access will be controlled or monitored? *For example, will there be role-based or other access controls? Will there be multi-factor authentication? How will you monitor and manage access for people who change roles or leave the agency?*
Consumers are authenticated via MHA and must have the appropriate level of identity verification before being able to access any information about themselves.

Any other roles who have access to consumer information submitted via My Health Record have their own monitoring and access control processes in place. |

C. Any other Information

| **Please state** any other steps the project has taken/ will take to prevent loss, misuse, unauthorised access, modification, or disclosure of personal information

For example:
- *Is there a need for additional privacy training, new policies, processes, or contracts?*
- *How will you keep physical copies of documents secure?*
- *How will you ensure conversations are not overheard?*
- *What checks will be done to ensure you're talking to, and sharing information with, the right person?*
- *Does the project involve interaction with other agencies (e.g., sector partners, providers, other government agencies)? What agreements are in place to ensure all parties understand their privacy obligations (e.g., MoUs, supply agreements)?*
- *What are the security classification and any endorsements the information will have (e.g., IN-CONFIDENCE, STAFF IN-CONFIDENCE, MEDICAL IN-CONFIDENCE, SENSITIVE)* |
|---|

• *what backup processes is the project putting in place? Do they include backups of metadata (e.g., audit logs)?*	
None – this approach and design is the same as used for COVID-19	

Compliance check with Principle 5

Does the project comply with Principle 5?	YES	NO	UNSURE
When the project holds personal information, is it using security safeguards that are reasonable to protect against loss, access, use, modification, disclosure, or other misuse?	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 6).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 5. Once completed, please move on to the next section (Principle 6).

Principle 6:
Access to personal information

Under **Principle 6** of the Privacy Act 2020 an individual has the right to confirm **if an agency holds personal information** about them, **and** if it exists, to have **access** to that information.

Access to personal information includes the right to ask who has accessed it (i.e., information from audit logs). If an individual is given access to their information, the individual must be advised that they may request correction of their information.

Please outline how individuals will be able to access their information information. *For example, will it be through existing information request processes (e.g. requests for clinical records), or will a new process need to be put in place?*
The Consumer will be able to access authorised information about themselves directly within their device at the level of authentication / authorisation they have attained. Through existing information request processes and we will have a contact us page for them to get in touch with the Te Whatu Ora Contact Centre for assistance.
Please outline how you intend to ensure that it is possible to find the information about a specific individual?
Through existing information request processes. We will have a contact us page for them to get in touch with the Te Whatu Ora Contact Centre for assistance to gain access.
Please state: • if, and to what extent, the project can *audit* user access to the personal information • what will be audited, who will conduct the audit, how regularly the audit will occur etc *The identity of members of staff who have accessed an individual's information is personal information about that individual. This means this is something that individuals are entitled to request under the Privacy Act.*
The project team does not access personal information.

Compliance with Principle 6

Does the project comply with Principle 6?	YES	NO	UNSURE
Is there a process in place to ensure an individual can ask Te Whatu Ora if it holds personal information about them and the individual can access that information?	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 7).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 6. Once completed, please move on to the next section (Principle 7).

Principle 7:
Request to ask for correction of information

Under **Principle 7** of the Privacy Act 2020, where an agency holds information, the individual concerned is entitled to request correction of the information.

Please describe how an individual can ask to have their information corrected? *For example, will it be through existing processes, or will a new process need to be put in place?*
We will have a contact us page for individuals to get in touch with the Te Whatu Ora Contact Centre.   JSM forms accessible from within My Health Record will be sent to a Te Whatu Ora mailbox and will be processed through the Jira Service Management system by the Te Whatu Ora Contact Centre.
Please outline how you intend to ensure that it is possible to find the information about a specific individual and to correct it (or add a statement of correction) if required?
The supporting systems have existing processes to retrieve and update consumer information.
Please outline how a statement of correction provided by that individual will be managed so that it is always able to be viewed together with the disputed information. *For example, does your proposed system have the capacity to link or attach a statement of correction to a person's file?*
JSM forms have the ability to allow the consumer to attach evidence of documentation for the record that needs updating. The Te Whatu Ora contact centre staff can view the request including the attached evidence.

Compliance check with Principle 7

Does the project comply with Principle 7?	YES	NO	UNSURE
Is there a process in place to enable an individual to request the correction of their personal information?	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 8).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 7. Once completed, please move on to the next section (Principle 8).

Principle 8:
Accuracy of personal information before it is used or disclosed

Principle 8 of the Privacy Act 2020 states that an agency must not use or disclose information without taking reasonable steps to ensure that the information is accurate, up to date, complete, relevant and not misleading.

⚠ If you're not collecting information directly from the individual, or are relying on old records, (as examples) there is a risk that the information will not be accurate or up to date. Carefully consider the consequences for individuals if the personal information is not accurate or up to date.

How will you ensure that only **accurate, up to date, complete and relevant** information is acted on?
We are retrieving information from source systems. We will use existing processes in these source systems to make sure it is accurate and up to date.

Compliance check with Principle 8

Does the project comply with Principle 8?	YES	NO	UNSURE
Does the project ensure that information is accurate, up to date, complete and relevant before the information is used?	☒	☐	☐

- If you have answered "**Yes"**, please move on to the next section (Principle 9).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 8. Once completed, please move on to the next section (Principle 9).

Principle 9:
Do not keep information longer than necessary

Principle 9 of the Privacy Act 2020 states that an agency that holds personal information must not keep that information for longer than is required for the purposes for which the information may lawfully be used.

⚠ Principle 9 (*and rule 9 of the Health Information Privacy Code)* does not apply in a vacuum. There may be other rules and regulations that will specify how long certain information must be kept for (*e.g. Public Records Act 2005)*. Once those other legislative requirements for retention have been met, then under Principle 9 (*or Rule 9)* the information should be disposed of when it is no longer needed for the project. We strongly recommend that you engage your Records Manager to ensure records are managed consistently with the relevant general/functional disposal authority.

Please state:
- how long the information will be held by Te Whatu Ora   - the applicable legal requirements for retention of information (if any). *For example, Health (Retention of Health Information) Regulations 1996, Public Records Act 2005, General Disposal Authority 6, Functional Disposal Authority 1.*
My Health Record does not separately store information. Information displayed by My Health Record is retrieved and stored from/in MHA, NHI, the Aotearoa Immunisation Register and Éclair. The period of retention is consistent with all legal requirements and documented in the source systems relevant PIAs.

There will be audit logging and retention of information related to certificate generation that will be retained until the COVID Public Health Response Act is completely repealed (or longer if that is required for the International Travel Vaccination Certificate). The details to be maintained have been minimised. In the event of a fraudulent request for a certificate or use of a certificate, the integrity of the system requires that a record be securely maintained against which fraudulent activity can be verified. This data set is to be retained for auditing or fraud related queries and is managed as the record for the authority of issuance of the certificate.

There will also be audit logging and retention of information related to self-reported RAT results. The details retained are the MHA identifier, NHI, test result, date of reporting the test. This dataset is to be retained for auditing or fraud related queries.

Te Whatu Ora will also retain a copy of these audit log details within its Snowflake data warehouse tool. This dataset will be used for reporting which is consumed by the Qlik App and reports can be provided via email to those requesting the information. No reports produced from the information will identify any individual.

Personal information collected through the JSM forms will only be held for as long as required for the purposes in which it was collected.

| **Please state:** |
| • whether all the personal information needs to be retained by the project |
| • Whether the information needs to be retained in a form that identifies the individual (*can it be retained in a de-identified manner)* |

My Health Record does not hold any information, this is all retrieved and stored from/in MHA, NHI, the Aotearoa Immunisation Register and Éclair. The period of retention is consistent with all legal requirements and documented in the source systems relevant PIAs.

| **Please state:** |
| • how the information will be disposed of |
| • who is responsible for ensuring disposal occurs |

N/A

Note: We also recommend:
1. **prior** to disposing of any the information, that you engage your Records Manager,
2. subject to the advice of your Records Manager, you keep a list of what has been disposed of and under what general/functional disposal authority.

Compliance check with Principle 9

Does the project comply with Principle 9?	YES	NO	UNSURE
Subject to satisfying any records management requirements, personal information is only retained for as long as it is required for the purposes of the project.	☒	☐	☐

• If you have answered "**Yes**", please move on to the next section (Principle 10).
• If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 9. Once completed, please move on to the next section (Principle 10).

Principle 10:
Limits on use of personal information

Principle 10 of the Privacy Act 2020 requires that an agency which obtains personal information for one purpose **must not** use the information for any other purpose **unless** the agency believes on reasonable grounds that an exception applies.

⚠️ The Office of the Privacy Commissioner recommends keeping in mind the "no surprises test"- would the way in which you're planning to use the personal information come as a surprise to the person you collected it from?

Please describe how the information will be used in this project?
For example, if we are using information to assess an individual's eligibility to deliver a service, outline what information is being used for assessing the eligibility and what is required to deliver the service.

We will use the information gained from MHA, NHI and AIR to display the vaccination history to the consumer.

We will use the information gained from Éclair to display Covid test results history to the consumer.

We will use the information to confirm the appropriate level of identity confidence to enable these functions within My Health Record.

We will use the information for audit, monitoring and reporting on the records retained.

These are consistent with the uses of the personal information for these systems:

MHA:

MHA uses personal information as set out here: https://www.tewhatuora.govt.nz/our-health-system/digital-health/my-health-account/privacy-statement/

For this My Health Records project, the relevant uses include allowing the individual "to connect and use participating third-party apps and services".

AIR and Éclair

Information collected as part of AIR and Éclair is part of managing the individual's health. The use of the information in My Health Record is consistent with managing an individual's health.

	YES	NO
Are the uses listed above consistent with the purposes of collection you have outlined in Principle 1?	☒	☐
If the answer is "**No**", **please state** what legislative exception applies. *The legislative exceptions can be found in Principle 10 of the Privacy Act or Rule 10 of the Health Information Privacy Code. If you're unsure if an exception applies, please contact your Privacy Officer.*		
N/A		

	YES	NO

Does the use of information by the project involve information matching or sharing?	☒	☐

If the answer is "**yes**", please provide more information here. *Please consider any additional issues that may arise (e.g., the need for agreements to enable and regulate matching and sharing).* Please annex any relevant documents to this PIA.

When a COVID-19 RAT test result is entered through My Health Record, the NHI number, name and date of birth will be matched to the NHI database to establish correct identity and to provide follow on health care.

When a request for an International Travel Vaccination Certificate on behalf of someone else is made through My Health Record, the NHI information the user provided for the other person will be matched to the NHI database to establish that it is a correct identity. Using the matched identity the immunisation records for that identity are retrieved from the Aotearoa Immunisation Register to create an International Travel Certificate.

When people submit a JSM form, the Te Whatu Ora Contact Centre will match the personal information provided with information already held by Te Whatu Ora to verify the person's identity and action their requests.

Compliance check with Principle 10

Does the project comply with Principle 10?	YES	NO	UNSURE
Will the personal information only be used for the purpose it was obtained or an exception applies?	☒	☐	☐

- If you have answered "**Yes"**, please move on to the next section (Principle 11).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 10. Once completed, please move on to the next section (Principle 11).

Principle 11:
Limits on disclosure of personal information

Principle 11 of the Privacy Act 2020 states that an agency must not disclose the information unless the agency believes on reasonable grounds that an exception applies.

The Office of the Privacy Commissioner recommends keeping in mind the "no surprises test"- would the way in which you're planning to disclose the personal information come as a surprise to the person you collected it from? Please note that **principle 11 does not limit** storing personal information in "the cloud" or sharing information with a service provider that stores or processes information on our behalf.

	YES	NO
Will the project disclose personal information to the individual concerned?	☒	☐
Will the project disclose personal information to individuals or agencies outside of Te Whatu Ora?	☒	☐

- If you have answered "**No**", please move on to the next section (Principle 12).
- If you have answered "**Yes**", please answer the following questions before moving to the next section.

Please state the basis for disclosing personal information *The grounds can be found in Principle 11 of the Privacy Act or Rule 11 of the Health Information Privacy Code.* *If you're unsure if an exception applies, please contact your Privacy Officer.*
Personal information collected as a part of reporting a RAT will be submitted to Éclair which is a system outside Te Whatu Ora. Any personal information shared as a part of reporting a RAT result is for clinical reporting and creating a case for the person and to make sure necessary clinical support is provided if a positive COVID-19 test result is reported.

If there is a disclosure to someone **other than the individual concerned, please:**
   • list all parties that you will disclose the information to
   • explain why those third parties need the information
   • outline what safeguards will be put in place to ensure that the information is secure once it has been shared with the third party

This project will disclose vaccination information on children under the age of 12 to their parents/caregivers where the whānau relationship has been established within MHA.
 	
Child added by MHA's "Add a child" feature will show the following information:
 	
   • First name
   • Age
   • NHI
   • Vaccination date
   • Vaccination product given
 	
Note: When a parent adds a child's vaccination history using the "Add a child" link, the "Facility the product was administered" will be removed.
 	
Controls around the disclosure of a child's vaccination information to their parents/ caregivers is addressed in the MHA PIA- https://www.tewhatuora.govt.nz/our-health-system/digital-health/my-health-account/privacy-statement

Compliance with Principle 11

Does the project comply with Principle 11?	YES	NO	UNSURE
Personal information is not disclosed to an individual or agency outside of Te Whatu Ora or an exception applies.	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 12).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 11. Once completed, please move on to the next section (Principle 12).

Principle 12:
Disclosure of information outside of New Zealand

Principle 12 of the Privacy Act provides that an agency may only disclose personal information to a foreign person or entity (B), if:

- The individual authorises it in situations where B may not be able to protect the information to the same degree as a NZ entity would; or
- B carries on business in NZ and is therefore subject to the Privacy Act 2020; or
- B's privacy laws offer comparable safeguards to the NZ Privacy Act 2020; or
- B is bound by contract or agreement to protect the information with similar safeguards to NZ standards.

⚠️ Please note that **principle 12 does not limit** storing personal information in "the cloud" or sharing information with a service provider that stores or processes information on our behalf

	YES	NO
Will Te Whatu Ora – Health New Zealand disclose personal information to a foreign person or entity?	☐	☒

- If you have answered "**No**", please move on to the next section (Principle 13).
- If you have answered "**Yes**", please answer the following questions before moving to the next section.

Please state:

- The foreign entities or persons that we will be disclosing personal information to
- Where the foreign entities or persons are based (i.e., which jurisdiction)
- Why the foreign entity or person needs to have the personal information
- what evidence you have that the foreign entity receiving information has the same safeguards available to protect the information as are provided under the Privacy Act 2020.
    - If the foreign entity cannot provide the same safeguards, indicate whether that has been explained to the individual, what has been explained and whether the individual consents to the sharing of their information with the foreign entity. Please provide evidence of that consent.
- Provide details on what safeguards have been put in place to protect the individual's information (such as a contract or an agreement with the foreign entity).
- Has an ethics or research committee, such as Health and Disability Ethics Committee, approved overseas disclosure?

A Consumer may choose to use their International Travel Vaccination Certificate in overseas settings – but no further disclosure will occur from the My Health Record processes if this is the case – the document will stand on its own with an embedded 'signature' in the QR Code incorporated into the certificate.

Compliance check with Principle 12

Does the project comply with Principle 12?	YES	NO	UNSURE

Personal information is not disclosed outside of New Zealand, or it is authorised under Principle 12	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Principle 13).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 12. Once completed, please move on to the next section (Principle 13).

Principle 13:
Creation or use of unique identifiers

Principle 13 of the Privacy Act 2020 says an agency may only **assign** a unique identifier to an individual if that identifier is necessary to enable the agency to carry out 1 or more of its functions effectively.

To avoid doubt, Te Whatu Ora – Health New Zealand does not **assign** unique identifiers when it records and uses a unique identifier so that we can communication with another agency about the individual.

Unique identifiers are individual numbers, references, or other forms of identification allocated to people by organisations to uniquely identify the person to the organisation assigning the identifier.

Examples include driver's licence numbers, passport numbers, IRD numbers, employee ID numbers, or National Health Index (NHI) numbers.

	YES	NO
Will the project **assign** unique identifiers?	☐	☒
Will the project **use** unique identifiers?	☒	☐

- If you have answered "**No**" to these questions, please move on to the next section (Principle 13).
- If you have answered "**Yes**" to any one of these questions, please answer the following questions before moving to the next section.

Please explain:
- What unique identifiers will be assigned or used for this project - How will the unique identifiers be created? - If you're proposing to use NHIs, can the project's purpose be achieved by using an alternative unique identifier - Are you intending to use a unique identifier that has been assigned by another agency? *If so, please consult your privacy officer.*

We use the NHI given to us by MHA to identify the correct records to pull from AIR to display the vaccination history and to generate an International Travel Vaccination Certificate when requested.

We use the NHI given to us by MHA (or by the user in case of 'on behalf of' requests) to identify the correct records to assign the COVID-19 RAT Test result where it is entered by the user.

The NHI is the unique identifier for patients who receive healthcare in New Zealand and 'is the cornerstone of clinical and administrative patient-related information'.

Unique identifiers are created for every International Travel Vaccination Certificate generated (so a Consumer who generated three Certificates for themselves would have a different identifier on each one). Each certificate will be issued with a unique identifier captured within it, and this will be retained in the audit

log. The UVCI (unique vaccine certificate identifier) of the Certificate will be held in the log so it can be queried in the event of a fraud investigation or other relevant query.

Compliance check with Principle 13

Does the project comply with Principle 13?	YES	NO	UNSURE
	☒	☐	☐

- If you have answered "**Yes**", please move on to the next section (Review and sign off).
- If you have answered "**No**" or "**unsure**", please complete the Risk and Mitigation Table (Appendix 1) in respect of this Principle 13. Once completed, please move on to the next section (Review and sign off).

Review and sign off

Privacy Officer / Privacy Committee/ Privacy & Security Governance Group review	
Name: Viv Kerr - Head of Privacy Signature: _____Viv Kerr_____	Date: 3 / 12 / 2023
Business Owner	
Name: _Michael Dreyer_ Signature: _____	Date: 1 / 12 / 2023
Project Manager	
Name: Nina Spence Signature:	Date: 24/11/2023

Appendix 1: Risk and Mitigation Table

- This risk and mitigation table aims to help you identify, describe, and mitigate actual and potential privacy risks involved in your project.
- For "**privacy risk description**", please identify each vulnerability associated to the Privacy Principle you are assessing. There may be more than one actual or potential risk for each Privacy Principle/ Rule.

Risk Reference Number	Privacy Principle or Rule	Privacy Risk Description	Existing Controls (preventative or detective)	Assessment of current residual risk	Recommended mitigations or privacy enhancements	Revised risk rating	Risk and mitigation owner	Date of implementation
	Please state the Privacy Principle (under the Privacy Act 2020) or the Rule (under the Health Information Privacy Code 2020) that you are assessing the risks for	*Please provide a description of the potential and actual privacy risk identified*	*Document the existing systems and safeguards in place that act to minimise the privacy risk identified*	*Assess the risk with the existing safeguards and systems in place*	*Specify recommendations for how the residual risks can be removed, managed to ensure the individual is protected*	*Assess the risk when the new safeguards to be implemented*	*Please specify who is responsible for implementing the privacy mitigations or enhancements*	*Please specify the date by which the privacy mitigations or enhancements are to be implemented*
R.01	**Rule 2 HIPC**	Data might be collected for COVID-19 Rat Test result or international travel certificate 'on behalf of' where no authorisation was given by individual	In all instances where data can be collected 'on behalf of' there is a checkbox to confirm that the individual is authorised to do so. To enter any data within My Health Record the user is required to have a user login and be verified to 2N or 3N level. Any unauthorised data entered would not be entered anonymously. An audit trail is possible. A certain level of knowledge is required including NHI, Name and Date of birth to enter data on behalf**.**	Probability: **Possible** Consequence: **Minor** Risk rating: **Low**	Future implementations of 'on behalf' functionality will use My Health Account linking, either delegations or legal linking, as this becomes more granular and accessible. **Improvements** to this functionality will be released in line with the Hira programme by June 2024.	Probability: **Possible** Consequence: **Minor** Risk rating: **Low**	Loren Shand – Group Manager, Design and Channels	**31 December 2024**
R.02	**Rule 3 HIPC**	Individuals may not be aware why the data is being collected and how it will be used	Links to the Privacy statement are provided before any data is collected**.**	Probability: **Possible** Consequence: **Minor** Risk rating: **Low**	No further technical mitigation is possible. Plain language communications and app content can mitigate this.	Probability: **Possible** Consequence: **Minor** Risk rating: **Low**	Viv Kerr – Chief Privacy Officer	
R.03	**Rule 5 HIPC**	Data might be accessed by unauthorised users	Access to data within My Health Record is limited to verified users (and to their children's data where applicable) through My Health Account login with appropriate login security safeguards. Data is not stored within My Health Record. Data collected via My Health Record is sent to other Health databases and systems and governed by their own PIA and risk register.	Probability: **Unlikely** Consequence: **Significant** Risk rating: **Medium**	Mitigation of this risk is the responsibility of the My Health Account authentication and authorization system.	Probability: **Unlikely** Consequence: **Significant** Risk rating: **Medium**	Joel Brown – Group Manager, Identity and Access	

Appendix 2: Glossary

Please complete the following table with terms, abbreviations, and acronyms you have used in this PIA.

| Term	Definition, description, relationship, and business rules
HNZ	Te Whatu Ora – Health New Zealand
AIR	Aotearoa Immunisation Register
NHI	National Health Index
MHA	My Health Account
MCR	My Covid Record
JSM	Jira Service Management
MHR	My Health Record
NCTS	National Contact Tracing Solution – the NCTS enables accurate and timely information on all COVID-19 cases and contacts to be recorded and allows all regions of New Zealand to work together when required.
NDMS	National Disease Management Solution
NIA	National Integration Applications (middleware)
Episurv	The national notifiable disease surveillance database, operated by ESR, on behalf of the Ministry of Health.
Éclair	The national COVID-19 lab collection management and results repository operated by ESR
CPIR	Population Identification and Registration – Tailored health services through personalization
Cogito	New Zealand Certificate Issuing Authority (NZ CSCA) for International Digital Covid Certificate.
MOH	Ministry of Health
MATTR	Company providing QR code certification for International Travel Certificate, and interfacing with Cogito and the EU DCC Gateway to produce the International DCC.
ESR	Institute of Environmental Science and Research, a Crown Research Institute
PCR	This test is a swab of the back of your nose — this is often called a nasopharyngeal test, or polymerase chain reaction (PCR) test.
RAT	Rapid Antigen Test – a test generally taken with a front of nose swab to detect the presence of specific proteins on the outer portion of the virus, such as the spike protein. The advantage of RATs is that they give a result quickly (often in less than 15 minutes), which assists with rapid risk assessment and reduces the amount of time a positive individual is active in the community.
Web app	Web app is a single page application that is web-based and is access by using a secure login. It is distinct from a native app (IOS/Android) that is downloaded and installed on the user's device. This is the web-based app that Consumers will log into using their DI account.
CICS	COVID Immunisation Consumer Support

My Health Record PIA December 2023

| API	Application Programming Interface – a software intermediary that allows two applications to 'talk' to each other.
NES	National Enrolment Service

Appendix 3: Visual Designs

Landing Page

This has the Sign up and Log in functions which takes you to My Health Account. It also has access to the Privacy statement, Terms of use and Contact information in the Footer.
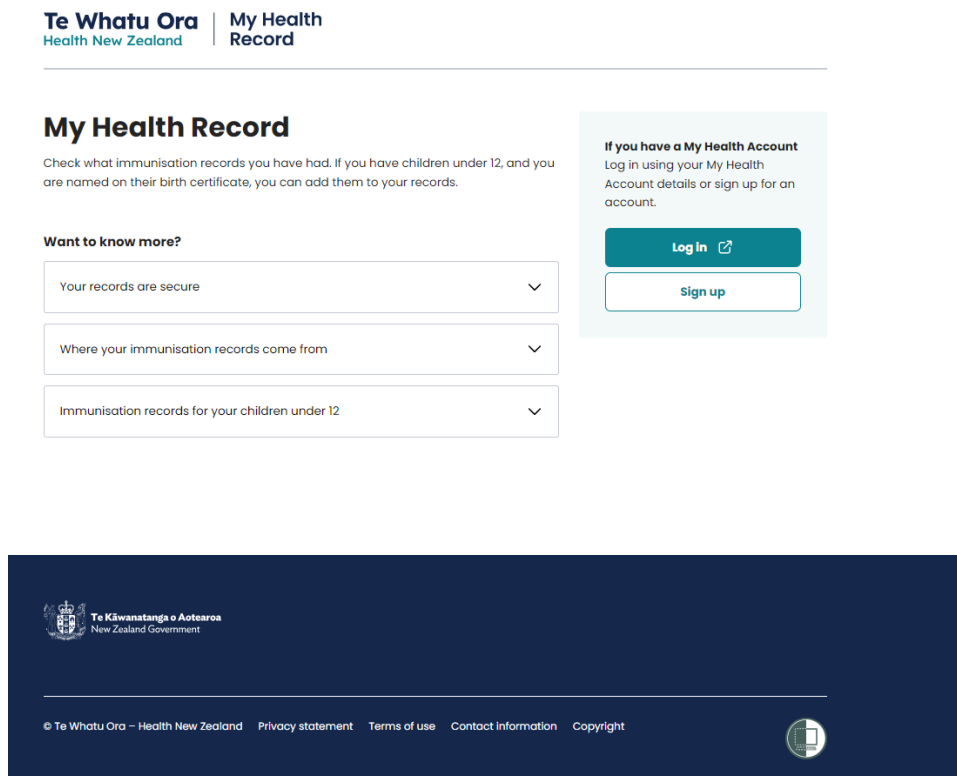
Walkthrough for first time users and the ability to skip (this will be remembered as user preference)
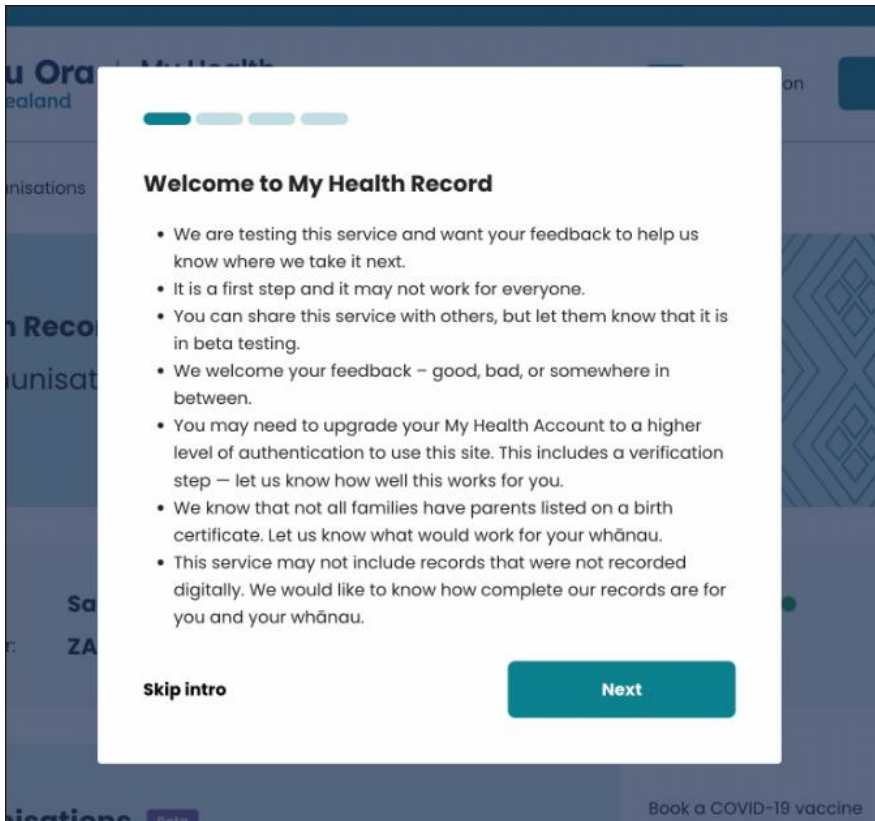
Home page

Displays user details, identification level, and the core functionalities available for the user (Immunisations, COVID-19 Test results, Report a RAT, Add tamariki under 12, and link to My Health account to manage the user account)
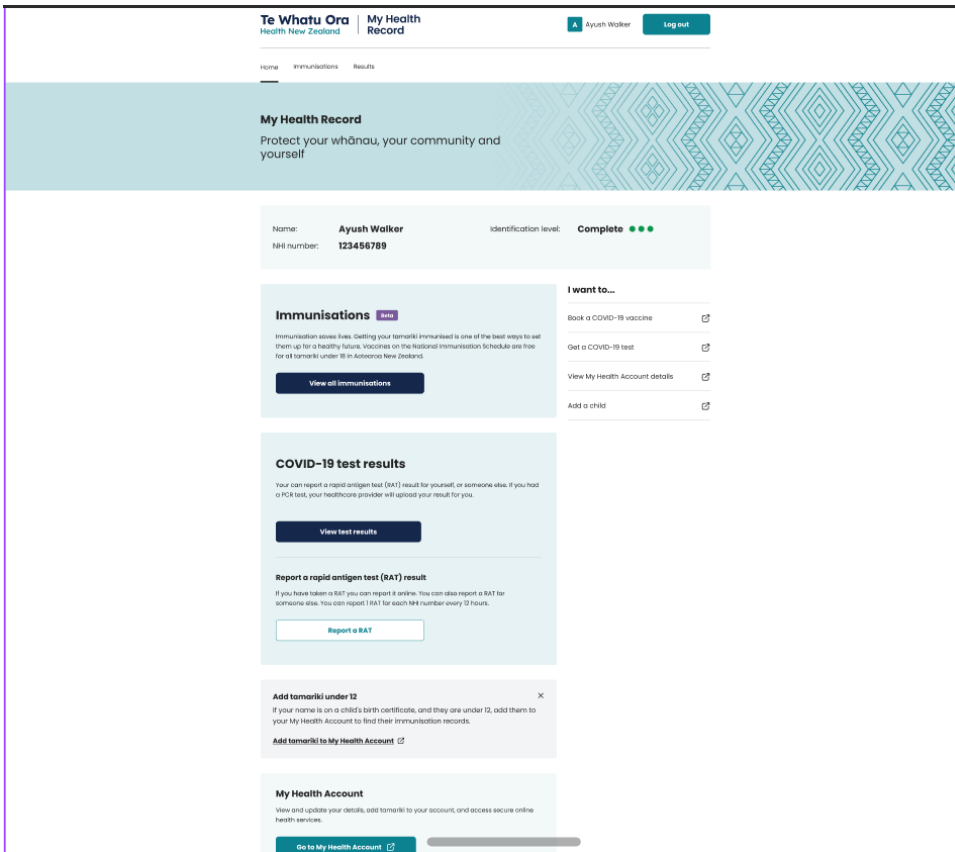
Immunisations – Displays all vaccination records for Level 3N user. View vaccination records of linked children

This page has access to your vaccination history. It also has access to your children's vaccination history if you have Linked them using the "Add a child" feature in My Health Account. You can request an international travel vaccination certificate from this section

Immunisations – Displays all COVID-19 vaccination records for Level 2N user, cannot link a child or view vaccination records of linked children until account is upgraded to 3N

Te Whatu Ora Health New Zealand | **My Health Record**

K Kimmy Woods ZP   [Log out]

Home   Immunisations   Results

Immunisations

Want to see all your immunisations?

You can currently see your COVID-19 vaccine records on this site. If you would like to see all your records, you'll need to provide some more information so we're sure it's you.

Upgrade your identity via My Health Account ⧉

⑦ **Learn why immunisation records may be missing**   →

Showing 3 records   ✉ **Email my records**

COVID-19
10 October 2023   ⌄

COVID-19
10 October 2022   ⌄

COVID-19
10 October 2021   ⌄

I want to...

Book a COVID-19 vaccination   ⧉

Get a COVID-19 test   ⧉

View My Health Account details   ⧉

Proof of COVID-19 immunisation status

If you are travelling overseas and must show proof of your COVID-19 immunisation status, you need an **International Travel Vaccination Certificate**.

[Request a COVID-19 certificate]

Logged in – Get a copy of your vaccination history flow:

← Back

Email your immunisation records

A PDF of the immunisation records will be emailed to you within 24 hours.

Select records to export

◉ All immunisation records (including COVID-19)

○ COVID-19 immunisations only

[Continue]

← Previous step

Enter the email address you would like your records sent to

Email address

e2e.c3.test+E2EMaryDemo@gmail.com ✕

Send records

We have received your request

A PDF of your immunisation records should be emailed to you within 24 hours.

If you do not receive them, call **0800 222 478**

Back to immunisations

Immunisation records for Mother Young Family Five

Date of birth: 06 May 2007   **NHI number:** ZKF6594

This medical information is confidential

This is an official record of your vaccination information held in the Aotearoa Immunisation Register as of 24 November 2023. Vaccines given before 2005 may not show here because vaccines were not recorded in the National Immunisation Register (NIR). Privately funded vaccines or vaccines given overseas will not show unless you have asked your healthcare provider to add them.

For more information visit my.health.nz/missing-immunisations

Vaccine	Batch number	Date given
Flu (influenza)	AQ2775	10 November 2023
COVID-19	ZZ775533-001	21 October 2023
Measles, mumps and rubella (MMR)	ZZ775533-001	10 October 2023
COVID-19	ZZ775533-001	10 March 2023
COVID-19	ZZ775533-001	30 January 2023
Measles, mumps and rubella (MMR)	BATCH-001	19 November 2022

Te Kāwanatanga o Aotearoa
New Zealand Government

Te Whatu Ora
Health New Zealand

Page 1 of 1

Appendix 4: Self-report a RAT result

Te Whatu Ora | **My Health**
Health New Zealand | **Record**

[M] Mother Family Five   **Log out**

← Back

Report a Rapid Antigen Test (RAT) result

- You can report a RAT result for yourself or for someone else
- You'll need a contact mobile number for you, or the person you are reporting a RAT result for
- Results need to be entered the day the test was taken – you can not backdate a test
- Results can be removed up to 20 minutes after being entered
- If the RAT result is positive for COVID-19, the whole household must isolate
- If you have difficulties breathing, or need urgent medical attention, call **111** immediately

Continue

Quit

Te Whatu Ora | **My Health**
Health New Zealand | **Record**

[M] Mother Family Five   **Log out**

← Previous step

Enter details

Select who you are reporting this RAT result for

Myself	Someone else

Mobile number

[flag] ⌄ +64 21 234 5678

Privacy and consent

☐ I have read and agree to the **privacy statement**. I consent to receiving COVID-19 communications on this mobile number.

Reporting a RAT without authority is an offence under section 212 of the Privacy Act 2020 and could result in a conviction and a fine.

Continue

Quit

Te Whatu Ora | My Health
Health New Zealand | Record

☒ Mother Family Five   Log out

← Previous step

Enter details

Select who you are reporting this RAT result for

| Myself | Someone else |

Enter their details

These details will appear on their official health record.

- Personal details need to match their NHI record.
- If they would like to update their details, they can complete this **change of details form** ☐

NHI number

[   ]

ⓘ **How to find NHI number**

ⓘ **About NHI numbers**

First name

[   ]

Middle name(s)

[   ]

Last name

[   ]

Date of birth

| Day | Month | Year |
| [   ] | [   ] | [   ] |

For example, 31 3 1980

Mobile number

[🇳🇿 ∨   +64 21 234 5678]

Privacy and consent

☐ I have read and agree to the **privacy statement**. I consent to receiving COVID-19 communications on this mobile number.

Reporting a RAT without authority is an offence under section 312 of the Privacy Act 2020 and could result in a conviction and a fine.

| Continue |

Quit

Appendix 5: Request an International Travel Vaccination Certificate

Using My Health Record, a consumer will be able to request that an International Travel Vaccination Certificate is generated and emailed to them (to the email address associated to their My Health Account). The International Travel Vaccination Certificate will not be returned to or stored by My Health Record. To ensure equity of access a Consumer will also be able to request that an International DCC is generated and distributed to them via assisted channels.

The International Travel Vaccination Certificate will enable Consumers to confirm their vaccination status to overseas countries that allow entry across their borders based on EU Digital COVID Certificate (EUDCC) standards.

Te Whatu Ora | **My Health**
Health New Zealand | **Record**

[M] Mother Family Five   **Log out**
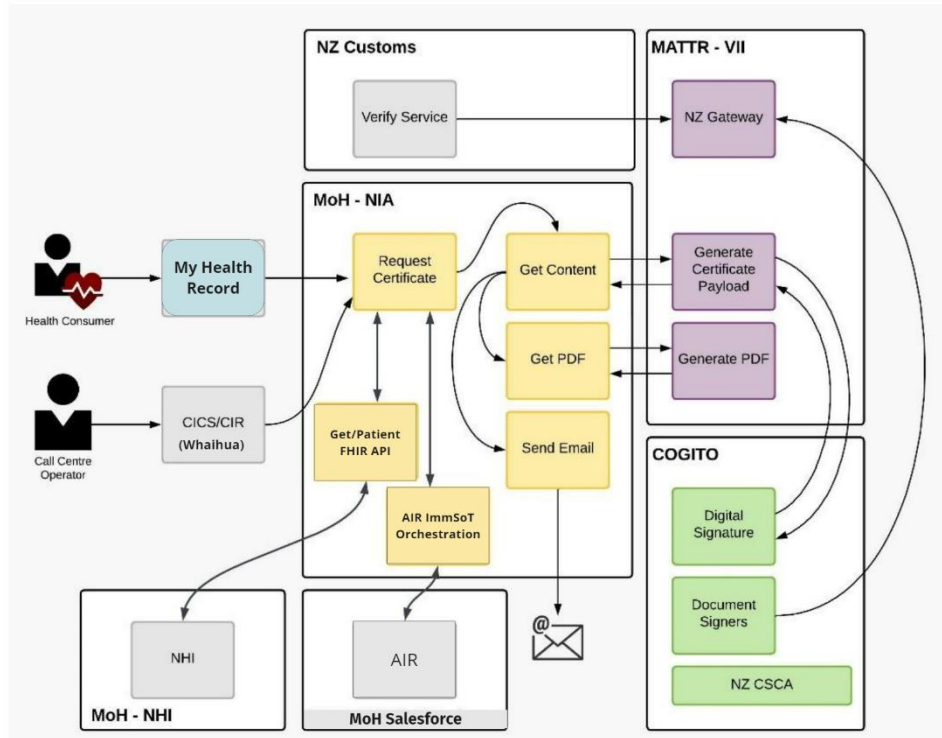
← Back

Proof of COVID-19 immunisation status

If you are travelling overseas and must show proof of your COVID-19 vaccination status, you need an International Travel Vaccination Certificate.

To get your international travel certificate you can:

- request it online through My Health Record
- call **0800 282 926 - choose option 4**
- visit a **participating vaccination site** ⧉

Continue

About passes and certificates

Quit

Te Whatu Ora | **My Health**
Health New Zealand | **Record**

[M] Mother Family Five   **Log out**

← Previous step

Enter details

Select who this certificate is for

Myself	Someone else

Confirm your details

These details will appear on your International Travel Vaccination Certificate.

- These details come from your **NHI number**
- These details need to match what's on your passport. If they don't match your passport or you would like to update them, complete this **change of details form** ⧉

First name
Mother

Middle name(s)
Young

Last name
Family Five

Use a different name

Date of birth
06 May 2007

Send certificate to

Email address

e2e.c3.test+mother@gmail.com   ⊗

Request certificate

Quit

Te Whatu Ora | My Health
Health New Zealand | Record

[Mother Family Five] [Log out]

← Previous step

Enter details

Select who this certificate is for

| Myself | Someone else |

Enter their details

Their name and date of birth will appear on their International Travel Vaccination Certificate.

- These details need to match what's on their vaccination record and passport.
- If their details don't match their vaccination record or passport or they would like to update them, they can complete this **change of details form** ⧉

NHI number

[   ]

ⓘ **How to find NHI number**

ⓘ **About NHI numbers**

First name

[   ]

Middle name(s)

[   ]

Last name

[   ]

Date of birth

| Day | Month | Year |
| [   ] | [   ] | [   ] |

For example, 31 3 1980

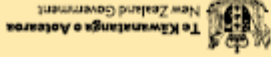**Send certificate to**

Email address
e2e.c3.test+mother@gmail.com

Privacy

☐ I have the authority to request a pass or certificate on behalf of this person and have read and agree to the **privacy statement**.
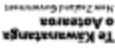
Requesting a pass or certificate without authority is an offence under section 212 of the Privacy Act 2020 and could result in a conviction and a fine.

[Request certificate]

Quit

Example International travel certificate

COVID-19
Vaccination
Certificate
for international travel

FOR TESTING PURPOSES ONLY

Let's work together
to protect each other

Stay home if you're sick

If you have COVID-19 symptoms, get a test

Wear a face covering on public transport and in many public places

Wash or sanitise your hands

Cough or sneeze into your elbow

Use the NZ COVID Tracer app to scan QR codes to record your visits & turn on Bluetooth tracing

FOR TESTING PURPOSES ONLY

Personal details

Surname:	GREEN
Given names:	MARY
Date of birth:	19 OCT 1999

Vaccine details

Disease targeted:	COVID-19
Vaccine / prophylaxis:	SARS-CoV-2 mRNA vaccine
Medicinal product:	Comirnaty
Manufacturer:	Biontech Manufacturing GmbH

Vaccination details

Dose number:	8
Total series of dose:	8
Date of vaccination:	01 NOV 2023

Certificate expiry date: 20 NOV 2024

This certificate is only valid when presented alongside your passport.

Please keep this vaccination certificate, which includes medical information about the vaccination you have received.

M21-0303(1) v1.3.1 | HP7888

Appendix 6: JIRA service management (JSM) forms

General enquiry

Te Whatu Ora / Records.health.nz support

Records.health.nz support

Help using Records.health.nz

We aim to respond to your request within 1 to 5 working days. If you need help straightaway, contact us on 0800 222 478.

You can contact us:

- Monday, Tuesday, Thursday, and Friday, 8am to 5pm
- Wednesday, 9:30am to 5pm
- Saturday and Sunday, 9am to 2pm

What can we help you with?

> 💬 **Make a general enquiry**
> If you have an enquiry about your vaccination records, require COVID-19...   ⌄

Raise this request on behalf of*

Enter name or email...   ⌄

Let us know if you have a question about your immunisation records or want to raise a concern.

Email confirmation to*

Summary*

Description

Updating your information (JSM)

Te Whatu Ora / Records.health.nz support

Records.health.nz support

Help using records.health.nz
We aim to respond to your request within 1 to 5 working days. If you need help straightaway, contact us on 0800 222 478.
You can contact us:
• Monday, Tuesday, Thursday and Friday, 8am to 5pm
• Wednesday, 9:30am to 5pm
• Saturday and Sunday, 9am to 2pm.

What can we help you with?

    ⊞   **Update your information**
         Let us know what needs to be updated.   ⌄

Raise this request on behalf of *

    🖼 Sol Smith (sol.smith@health.govt.nz)   ⊗   ⌄

Attachment

    Drag and drop files, paste screenshots, or browse

    Browse

Who are you filling this form out for?

○ Myself
○ Someone else (with their consent)

Privacy

Let us know what information you need to update. We will store your information securely and only use it to:

• find your current information and immunisation records

• process your request

• contact you if we need to.

- contact you if we need to.

Read the Records – Health New Zealand privacy statement

I have read the privacy statement and understand how the information I provide will be used. *

☐ Accept and continue

Personal details

We need this information to find your records.

First name *

[   ]

Middle name

[   ]

Family name

[   ]

Date of birth *

[e.g. 09/06/2023   📅]

National Health Index (NHI) number

You will have an NHI number if you have received medical care in New Zealand. Providing your NHI is optional. It will help us find your records and will be used to add your COVID-19 immunisations. You can find your NHI on a prescription or prescription receipt, a prescription medicine label, a hospital letter, an x-ray or test result, or your online patient portal.

[   ]

Read more about NHI numbers

Email *

This should be the email address you want us to use to contact you about your request.

[   ]

Confirm email *

Contact phone number

Use a mobile number if you can. This can be a New Zealand or international phone number. If entering an international number, include the country code (such as +61 for Australia).

Current residential address *

This will help us to find your records

Last known residential address in New Zealand

If your current address is different to what is recorded against your NHI this will help us find your records.

What information do you need to update?

Select 1 or more options *

- ☐ name
- ☐ date of birth
- ☐ COVID-19 immunisation date
- ☐ COVID-19 immunisation record
- ☐ other.

Name

What is the name shown on your record?

The name on your record is the name linked to your National Health Index Number (NHI). If this name is wrong, contact your healthcare provider to update it.

[   ]

Date of birth

What is the date of birth shown on your record?

[e.g. 09/06/2023   📅]

COVID-19 immunisation details

We need this information so we can check the COVID Immunisation Register (CIR) and Book My Vaccine for your vaccination records.

Which COVID-19 immunisation record is missing?

[   ]

Which COVID-19 immunisation record has the wrong date?

[   ]

How did you make your booking?

[   ]

Enter your booking confirmation number, if you have one.

[   ]

Which country were you vaccinated in?

Overseas vaccinations will not show unless you have requested, they be added to the COVID-19 Immunisation Register.

When were you immunised?

Provide as much detail as possible, including dates and times.

Where were you immunised?

Provide as much detail as possible, including the name of the immunisation site and the address or suburb.

If there is other information that will help us, add it here.

For example, if you were immunised with friends or members of your whānau, provide their details, such as their name.

Request an International Travel Vaccination Certificate (JSM)

Te Whatu Ora / My Covid Record Support

My Covid Record Support

My Covid Record - http://mycovidrecord.health.nz

What can we help you with?

> **Request an International Travel Vaccination Certificate**
> If you are travelling overseas and need proof of your COVID-19 vaccination...   ⌄

Email confirmation to *

[   ]

To get a copy of your International Travel Vaccination Certificate, we need the following information to find your records.

Click here to read the Te Whatu Ora privacy statement

I have read the privacy statement and understand how the information I provide will be used. *
☐ Accept and continue

Who are you filling this form out for?
○ Myself
○ Someone else (with their consent)

First name *

[   ]

Middle name

[   ]

Last name

[   ]

Name you want displayed on your International Travel Vaccination Certificate
The name on your certificate must match the name on your passport.

[   ]

Date of birth *

[e.g. 25/10/2023   📅]

National Health Index (NHI) number
If you have received medical care in New Zealand before, you will have an NHI number. Providing your NHI is optional. It will help us find your records and will be used to record your COVID-19 vaccinations. You can find your NHI on a prescription or prescription receipt, a prescription medicine label, a hospital letter, an x-ray or test result, or your online patient portal.

[   ]

Follow this link for more information on NHI numbers.

Email *
This should be the email address you want us to use to contact you about your request.

[   ]

Confirm email *

Contact phone number

Use a mobile number if you can. This can be a New Zealand or international phone number. If entering an international number, include the country code (such as +61 for Australia).

Current residential address *

This will help us find your records

Last known residential address in New Zealand

If your current address is different to what you have recorded against your NHI this will help us find your records

Do you need a copy of your COVID-19 Vaccination Record?

This can be used alongside your International Travel Certificate. It will include batch numbers, dose number, vaccine type, and any overseas vaccinations you've requested to be added to your health record.

○ Yes, send me a copy of my vaccination record

Send   Cancel

Request a copy of COVID-19 Vaccination Record (JSM)

My Covid Record Support

My Covid Record - http://mycovidrecord.health.nz

What can we help you with?

> ### Request a copy of your COVID-19 Vaccination Record
> If you have had a COVID-19 vaccination, you can request a copy of your... ⌄

Email confirmation to *

To get a copy of your COVID-19 Vaccination Record, we need the following information to find your records.

Click here to read the Te Whatu Ora privacy statement.

I have read this privacy statement and understand how the information I provide will be used *

☐ Accept and continue

Who are you filling this form out for?

○ Myself
○ Someone else (with their consent)

First name *

Middle name

Last name

[   ]

Name you want displayed on your COVID-19 Vaccination Record

If different to the above such as, a preferred name or the name that matches your identification documents

[   ]

Date of birth *

[e.g. 25/10/2023   📅]

National Health Index (NHI) number

If you have received medical care in New Zealand before, you will have an NHI number. Providing your NHI is optional. It will help us find your records and will be used to record your COVID-19 vaccinations. You can find your NHI on a prescription or prescription receipt, a prescription medicine label, a hospital letter, an x-ray or test result, or your online patient portal.

[   ]

Follow this link for more information on NHI numbers.

Email *

This should be the email address you want us to use to contact you about your request.

[   ]

Confirm email *

[   ]

Contact phone number

Use a mobile number if you can. This can be a New Zealand or international phone number. If entering an international number, include the country code (such as +61 for Australia).

[   ]

Current residential address *

This will help us to find your records

[   ]

Last known residential address in New Zealand

If your current address is different to what is recorded against your NHI this will help us find your records.

[   ]

[Send]   Cancel

Feedback

Records.health.nz support

Help using Records.health.nz

We aim to respond to your request within 1 to 5 working days. If you need help straightaway, contact us on 0800 222 478.

You can contact us:

• Monday, Tuesday, Thursday, and Friday, 8am to 5pm
• Wednesday, 9:30am to 5pm
• Saturday and Sunday, 9am to 2pm

What can we help you with?

👍   Provide your feedback about the website   ⌄

Raise this request on behalf of *

Enter name or email...   ⌄

Email confirmation to *

Summary *

Description

Send   Cancel

Appendix 7

Proposed Privacy Statement for My Health Record

Privacy statement – My Health Record

My Health Record is a web application owned by Te Whatu Ora – Health New Zealand.

This privacy statement outlines how we may collect and handle your personal information in My Health Record in accordance with the Privacy Act 2020 and Health Information Privacy Code 2020.

We may update this privacy statement from time to time. This privacy statement was last updated on **29 November 2023.**

On this page:

⇓ About My Health Record
⇓ Your personal information
⇓ Collection of personal information
⇓ How we use the information
⇓ Sharing the information
⇓ How long we hold the information
⇓ Storing information securely
⇓ Access to and requests to correct information
⇓ Requesting information on behalf of someone else
⇓ Keeping your account safe
⇓ Google Analytics
⇓ Feedback
⇓ Close your My Health Record account
⇓ Privacy queries or concerns

About My Health Record

My Health Record may let you:

- view your immunisation records
- view the immunisation records of your children under the age of 12 – you must be named on their birth certificate
- view your COVID-19 test results
- report a COVID-19 RAT test result for yourself or someone else
- request an International Travel Vaccination Certificate for yourself or someone else.

To use My Health Record, you first need to create a My Health Account- part of this process is having your identity verified to Level 3N (or Level 2N for limited access of vaccinations records – Covid only). Adding children to your account can be done only after your identity is verified to Level 3N and whanau relationships are established in My Health Account. Information about identity levels is in the privacy statement.

Go to the My Health Account privacy statement.

Signing up with My Health Account and accessing My Health Record is voluntary. If you choose to not sign up with My Health Account then you are unable to access My Health Record. The alternative way to get your health records is to call or email Te Whatu Ora using the contact details provided in My Health Record contact us page.

Your personal information

Your immunisation records.

Once you have set up a My Health Account and your identity is verified, you may be able to access My Health Record. If we have records in our systems for immunisations, you may be able to see:

- Your name
- Your NHI number
- what immunisations you have received that we currently have records for in Te Whatu Ora Health NZ systems
- when you received them
- where you received them
- some information about the immunisations you received, such as the batch number, dose and manufacturer.

My Health Record may display immunisation information from the Aotearoa Immunisation Register (**AIR**).

Children's immunisation records

Within My Health Account you can add your children under the age of 12 if you are named on their birth certificate. If we have records in our systems for their immunisations, you may be able to see:

- Child(ren) first name as recorded in the NHI system
- Their NHI number
- What immunisations the child(ren) has received that we currently have records for in Te Whatu Ora Health NZ systems
- when they received them
- where they received them
- some information about the immunisations they received, such as the batch number, dose and manufacturer.

My Health Record may display the child(ren)'s vaccination information from AIR.

Your COVID-19 test result record.

Once you have been set up with a My Health Account and your identity verified, you may be able to see in My Health Record:

- Your name
- Your NHI number
- What COVID-19 test results from the previous 12 months that we currently have records for in Te Whatu Ora Health NZ systems
- Whether the test result was positive or negative for COVID-19
- What date the test was taken
- What type of test was taken
- Where you carried out the test
- Some information about the tests you carried out.

My Health Record may display your test information from Éclair

Your International Travel Vaccination certificate.

Once you have been set up with a My Health Account and your identity verified, you may be able to see in My Health Account and in emailed certificate:

- Your name and email address

- Your Date of Birth
- Your NHI number
- What vaccinations you have received that we currently have records for in Te Whatu Ora Health NZ systems
- When you received the vaccinations
- How many doses of the vaccine you received
- Some information about the vaccines you received.

My Health Record may display your vaccination information from Aotearoa Immunisation Register (AIR)

Report a COVID-19 Test RAT result

Once you have been set up with a My Health Account and your identity verified, you may be able to see in My Health Account:

- Your name
- Your Date of Birth
- Your NHI number
- Your mobile number

Collection of personal information

Report COVID-19 Rat test

My Health Record collects but does not separately store information when a COVID-19 RAT test result is recorded for self or on behalf of another person:

- Name
- Email address
- Date of Birth
- NHI
- Mobile phone number
- Covid RAT test result (Positive or Negative)
- Date and time of test

Where the user is reporting their own result, some of this information is automatically retrieved from My Health Account information. In the instance of reporting the COVID-19 RAT result on behalf of someone else, all the details need to be collected from the user.

Request an International Travel Vaccination Cert

My Health Record collects but does not separately store information when an International Travel Vaccination Certificate is requested (for self or on behalf of another person):

- Name
- Email address
- Date of Birth
- NHI

My Health Record retrieves information based on the above collected information from the Immunisation Registers (AIR) and generates a certificate with this information included:

- Vaccination Product Given
- Vaccination Date

- Vaccine Doses
- Some other information about the vaccines

Submit a form

You can submit a form requesting an update to your details or the details of another person who has provided consent, make a general enquiry and to provide feedback on My Health Record.

When you submit a form, we may collect the following information:

- personal details- full name, date of birth, NHI
- contact details- email, contact phone number and residential address
- immunisation details – which records are missing or wrong, booking information, when you were immunised, where you were immunised

If you do not provide us with this information, you may not be able to submit the form and we may not be able to action your request.

Completing the form on behalf of someone else

You can complete a form on behalf of someone else (including COVID-19 RAT result, request for International Travel Vaccination Certificate). You must confirm to us at the time you submit the form that have the consent of the other person to share their details with us.

How we use the information

Rapid Antigen Tests (RAT)

If you report a Rapid Antigen Test (RAT) result, we will keep these details in our testing systems. You may also report RAT results for another person if you have their permission to do so. Details we keep include the date the RAT was self-reported, the test result, the NHI and the My Health Account that the RAT was self-reported from, as well as the contact details you provide to My Covid Record.

Positive RAT results

If a positive result is reported, the personal details of that person the result was reported for, may be shared with the GP the person is enrolled with.

International Travel Certificates

You can request an International Travel Vaccination Certificate for yourself, or for another person if you have their permission to do so and you are each eligible for a certificate.

Your vaccination record

As well as viewing your vaccination record, you can also get a copy of it. The PDF document details the vaccinations included on your official health record.

Information collected through requesting an International Travel Vaccination Certificate or a copy of Immunisation records will be used to

- Identify the individual to match NHI to vaccination records
- Generate a International Travel Vaccination certificate or copy of Immunisation records
- Email the International Travel Vaccination certificate or copy of Immunisation records

Information collected through a form will be used to:

- Identify you in connection with your request
- communicate with you
- verify your identity

- action your request where appropriate.

Sharing the information

We may share your personal information internally with those involved in resolving submitted enquiries.

Any information you provide to us will be shared as set out in this privacy statement. It will not be shared with other government agencies without your consent. It will not be used for enforcement purposes unless there is evidence of fraudulent use of the services within My Health Account or My Health Record.

How long we hold the information

My Health Record displays immunisation records from our source system – the Aotearoa Immunisation Register (AIR). My Health Record does not store this immunisation information.

My Health Record displays test records from diagnostics source systems (ESR Éclair). My Health Record does not store this test information.

My Health Record collects personal information when a COVID-19 RAT test result is entered and passes it to other systems. My Health Record does not store this test information.

My Health Record collects personal information when an International Travel Vaccination Certificate has been requested and passes it to other systems for the purpose of generating a travel certificate. My Health Record does not store this information.

Information submitted through the forms will only be held for as long as required for the purposes outlined in this privacy statement.

Storing information securely

Information you choose to share with us will be held securely in compliance with Te Whatu Ora standards, the New Zealand Privacy Act 2020 and the Health Information Privacy Code 2020.

We take reasonable steps to ensure your personal information is protected against loss, unauthorised access, use, modification, disclosure, or other misuse.

Access to and requests to correct information

You have the right to access any information we hold about you and ask us to correct it if you think it is wrong.

To access any personal information held by us, or if you wish to correct your information, email help@my.health.nz

When making a request to access or change your information, include:

- your name
- contact address (residential or postal)
- your email
- contact phone number
- details of the information you want or want to correct. This needs to be as clear and specific as you can make it. We may ask you for more details.

Before we can provide you with your information or make any changes we need to be satisfied about your identity. To do so, we may need to ask you further questions or to view identification which confirms your identity.

Requesting information on behalf of someone else

If you are requesting information on behalf of someone else, you will need to provide their authorisation or other documentation to support that you have the right to do so.

Keeping your account safe

Do not share your My Health Account with other people. Keep your My Health Account password safe.

We recommend you use a screen lock on the device you use to access your My Health Account.

If you believe someone else knows your password you should change it. If you believe someone has accessed your My Health Account, call 0800 222 478 as soon as you can.

Google Analytics

We use Google Analytics to better understand your use of My Health Record. Google Analytics uses a set of first-party cookies to collect information and report site usage statistics without personally identifying individual visitors to Google.

Google Analytics collects the following information when you visit My Health Record:
- the pages you accessed on the website
- the links you clicked on
- the date and time you visited the website
- the referring site (if any)
- the operating system on your device
- the web browser you used, and
- other information, such as screen resolution and language settings.

You may opt-out from having Google Analytics collect your information by disabling cookies in your browser, or by installing the opt-out browser add-on.

Google Analytics Opt-out browser add-on.

Read the Google Analytics privacy policy.

We do not make any effort to identify individual users through Google Analytics.

Feedback

Feedback is important and we use it to evaluate and improve My Health Record. You can give us feedback by:
- phone 0800 222 478 8am to 5pm Monday, Tuesday, Thursday, and Friday. 9:30am to 5pm, Wednesday 9.30-5
- email help@my.health.nz

If you provide feedback by email, the email will be sent to the appropriate Te Whatu Ora staff. This could include your email address and other identifying information that you have provided.

Close your My Health Record account

You can close your My Health Record account by calling our support team on 0800 222 478 and requesting that your account is deleted.

Privacy queries or concerns

If you have any queries or concerns about how your personal information has been managed, contact us to see if we can resolve the problem. You can email us at hnzprivacy@health.govt.nz or write to us:

Privacy Officer
Te Whatu Ora
PO Box 793
Wellington 6140
 New Zealand

If you are not satisfied with our response to your concerns, you can contact the Office of the Privacy Commissioner.

<u>Contact the Officer of the Privacy Commissioner</u>.