

# Appraisal Report Amendment to an Existing Disposal Authority

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## Appraisal Report

### Amendment to an Existing Disposal Authority Department of Internal Affairs (AAAC)

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<b>Agency</b>	Department of Internal Affairs (AAAC)
<b>Contact Name and Details</b>	[Name and contact details removed]
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<b>Disposal Authority to be changed</b>	DA633

#### Purpose/Circumstances

The Department's Service Delivery and Operations branch is implementing a new Identity Check Service to provide a quick and convenient identity verification

process for public and private sector organisations. Individuals are directed to the Identity Check Service from organisations needing to confirm the individual's identity. It allows individuals to confirm their identity against documents such as their passport or driver licence by taking a live video of themselves, which is then checked against the photo in the relevant identity document database.

The Identity Check Service leverages technology to provide remote identity verification, without individuals being required to visit an organisation's premises or to have a RealMe account. The tool uses facial recognition technology, identity document biometric templates, and an evidence of liveness check (to prove that the captured video is a person and is not, for instance, a deep fake). When the identity document details, including the relevant photograph, match the information provided, with the individual's consent their full name, date of birth, identity document number, liveness confirmation and photograph match confirmation are disclosed to the requesting organisation. For certain organisations the individual may also be asked to authorise the disclosure of their live photo (for example where the individual's photo is to be attached to a physical card).

The records created as part of this service are not covered by a disposal class. The Department has consulted the Privacy Commissioner on appropriate retention periods and the purpose of this amendment is to provide authorisation to dispose of records in accordance with the periods agreed in that consultation.

### **Description of Amendment**

Five new classes (DIA1.30 – DIA1.34) have been added to DA633 to accommodate the Identity Check Service records.

## Major changes

### 1. Proposed Inclusion of a New Class or Class Grouping (Chief Archivist approval required – Major change)

	New Class Details
<b>Title</b>	Identity Check Service – Records provided by a user of the service or another agency to verify the user’s identity
<b>Number</b>	DIA1.30
<b>Description</b>	<p>Records provided to the Identity Check Service for identity matching by DIA that are provided either by:</p> <ul style="list-style-type: none"><li>• The individual using the service</li><li>• Another agency to be used for identity matching by DIA.</li></ul> <p>This includes, but is not limited to:</p> <ul style="list-style-type: none"><li>• Driver licence information (Waka Kotahi)</li><li>• Passport information (DIA).</li></ul>
<b>Retention Period</b>	Retain for the duration of the transaction
<b>Disposal Action</b>	Destroy
<b>Justification</b>	<p>These records comprise information from records that are held in the business systems of the agencies providing the information being used to confirm an individual’s identity. The Privacy Act 2020 (Privacy Principle 9) states that an organisation should not keep personal information for longer than it is required for the purpose it may lawfully be used. These records only need to be retained for the duration of the transaction.</p>

## Class or class grouping

### Description

Records provided to the Identity Check Service for identity matching by DIA that are provided either by:

- the individual using the service
- another agency to be used for identity matching by DIA

This includes, but is not limited to:

- Driver licence information (Waka Kotahi)
- Passport information (DIA).

### Value Statement

These records are recommended for destruction as they are administrative, facilitative and operational in nature. They are used to establish identity and the original records are recommended for retention as public archives or held by other agencies (e.g. DIA Passport information is transitory as passports are issued for a limited time, but the underlying citizenship record will be captured as a public archive).

### Retention and disposal recommendation

Destroy after completion of the transaction.

## 2. Proposed Inclusion of a New Class or Class Grouping (Chief Archivist approval required – Major change)

New Class Details	
<b>Title</b>	Identity Check Service – Live Photos, Videos and Liveness Confirmation Records, where the Identity is Confirmed
<b>Number</b>	DIA1.31
<b>Description</b>	Live photos, videos and liveness confirmation records that are created to determine if the individual using the service is genuine, where the individual authorises sharing their information with the organisation and identity is confirmed.
<b>Retention Period</b>	30 days from date of creation
<b>Disposal Action</b>	Destroy
<b>Justification</b>	<p>The Privacy Act 2020 (Privacy Principle 9) states that an organisation should not keep personal information for longer than it is required for the purpose it may lawfully be used.</p> <p>These records need to be kept long enough to allow a request to be made, by the requesting organisation, for a copy in the event of a suspected offence relating to the confirmation of identity. The retention period for these records has been consulted on with the Privacy Commissioner who has advised 30 days is appropriate as most offences will be identified promptly.</p> <p>These records are also kept to allow analysis into how the Identity Check Service is performing and whether any changes are required to the algorithm. When such analysis is undertaken, the industry standard is to utilise a month's worth of records.</p>

<b>Class or class grouping</b>
<b>Description</b>
Live photos, videos and liveness confirmation records that are created to determine if the individual using the service is genuine, where the individual authorises sharing their information with the organisation and identity is confirmed.
<b>Value Statement</b>
These records are recommended for destruction as they are facilitative and operational in nature, and have no archival value. The identity of the user once confirmed is held by the requesting organisation and subject to their retention periods.
<b>Retention and disposal recommendation</b>
Destroy 30 days from date of creation.

### 3. Proposed Inclusion of a New Class or Class Grouping (Chief Archivist approval required – Major change)

	<b>New Class Details</b>
<b>Title</b>	DIA1.32 Identity Check Service – Live Photos and Videos Records, where the Identity is Not confirmed
<b>Number</b>	DIA1.32
<b>Description</b>	Live photos, videos and liveness confirmation records that are created to determine if the individual using the service is genuine, where the individual does not authorise sharing their information with the organisation or is unable to successfully complete the liveness confirmation or identity document match.
<b>Retention Period</b>	Retain until no longer required

<b>Disposal Action</b>	Destroy
<b>Justification</b>	<p>The Privacy Act 2020 (Privacy Principle 9) states that an organisation should not keep personal information for longer than it is required for the purpose it may lawfully be used.</p> <p>These records only need to be retained for the duration of the transaction in the majority of cases. However these records, where identity is not confirmed, are also kept to allow analysis into how the Identity Check Service is performing and whether any changes are required to the algorithm. Analysis will typically be done for the previous month's data but the records may need to be retained longer at times to assess service performance and aid development.</p>

<b>Class or class grouping</b>	
<b>Description</b>	Live photos, videos and liveness confirmation records that are created to determine if the individual using the service is genuine, where the individual does not authorise sharing their information with the organisation or is unable to successfully complete the liveness confirmation or identity document match.
<b>Value Statement</b>	These records are recommended for destruction as they are facilitative and operational in nature, and have no archival value.
<b>Retention and disposal recommendation</b>	Destroy when no longer required.

#### 4. Proposed Inclusion of a New Class or Class Grouping (Chief Archivist approval required – Major change)

New Class Details	
<b>Title</b>	Identity Check Service – Metadata and Google Analytics Records
<b>Number</b>	DIA1.33
<b>Description</b>	Metadata and Google Analytics records relating to both successful and unsuccessful identity confirmations.
<b>Retention Period</b>	13 months from the last information entry date
<b>Disposal Action</b>	Destroy
<b>Justification</b>	<p>Google Analytics 360 is used within the Identity Check Service to track the access and use of service web pages. This information is collected for the purpose of identifying pain points in the individual journey so that improvements can be made.</p> <p>The Privacy Act 2020 (Privacy Principle 9) states that an organisation should not keep personal information for longer than it is required for the purpose it may lawfully be used. It is recommended that the information is retained for this period to allow year-on-year analysis of the Identity Check Service usage.</p>

Class or class grouping
<b>Description</b>
Metadata and Google Analytics records relating to both successful and unsuccessful identity confirmations.
<b>Value Statement</b>
These records are recommended for destruction as they are facilitative and operational in nature, and have no archival value.



**Retention and disposal recommendation**

Destroy 13 months from the last information entry date.

**5. Proposed Inclusion of a New Class or Class Grouping (Chief Archivist approval required – Major change)**

New Class Details	
<b>Title</b>	Identity Check Service – Management, Development and Delivery
<b>Number</b>	DIA1.34
<b>Description</b>	<p>Operational management, development and delivery records created and received in the course of providing the Identity Check Service to government agencies and other organisations, that are not otherwise covered by Classes DIA1.30-DIA1.33.</p> <p>These include but are not limited to:</p> <ul style="list-style-type: none"><li>• Communications with intermediaries, other providers and requesting organisations</li><li>• Internal correspondence and administrative records (e.g. registers, change control, system administration)</li><li>• Service delivery and management</li><li>• Design and development (e.g. architecture, service design, algorithm development)</li></ul> <p>Excludes:</p> <ul style="list-style-type: none"><li>• Communications with individuals regarding use of the Identity Check Service to confirm their identity, which are covered by Class 1.23.</li><li>• Records documenting co-operative arrangements, such as agreements and memoranda of understanding, strategic direction and policy, and major reviews and reports, which are covered by Class DIA7.08.</li><li>• Operational policies and procedures for DIA functions, which are covered by Class DIA7.12.</li></ul>

<b>Retention Period</b>	10 years from last information entry date
<b>Disposal Action</b>	Destroy
<b>Justification</b>	These records relate to the design, operation and management of the service and have business value only. Higher value records of strategic direction are covered by Class DIA7.08.

<b>Class or class grouping</b>
<b>Description</b>
<p>Operational management, development and delivery records created and received in the course of providing the Identity Check Service to government agencies and other organisations, that are not otherwise covered by Classes DIA1.30-DIA1.33.</p> <p>These include but are not limited to:</p> <ul style="list-style-type: none"> <li>• Communications with intermediaries, other providers and requesting organisations</li> <li>• Internal correspondence and administrative records (e.g. registers, change control, system administration)</li> <li>• Service delivery and management</li> <li>• Design and development (e.g. architecture, service design, algorithm development)</li> </ul> <p>Excludes:</p> <ul style="list-style-type: none"> <li>• Communications with individuals regarding use of the Identity Check Service to confirm their identity, which are covered by Class 1.23.</li> <li>• Records documenting co-operative arrangements, such as agreements and memoranda of understanding, strategic direction and policy, and major reviews and reports, which are covered by Class DIA7.08.</li> <li>• Operational policies and procedures for DIA functions, which are covered by Class DIA7.12.</li> </ul>
<b>Value Statement</b>

These records provide evidence of the design and operational management of providing the Identity Check Service. The records have business value only, for a limited time. Records documenting strategic direction and policy, and major reviews and reports of the service are covered by Class DIA7.08. Operational policies and procedures records for DIA functions are covered by Class DIA7.12, which are retained as public archives.

**Retention and disposal recommendation**

Destroy 10 years from last information entry date.

**6. Proposed Amendment (Chief Archivist approval required – Major change):**

	<b>Current Class Details</b>	<b>Proposed amended Class Details</b>
<b>Title</b>	Citizenship, BDM, Passports – Queries and Products	Citizenship, BDM, Passports, Identity Check – Queries and Products
<b>Number</b>	DIA1.23	No change
<b>Description</b>	<p>Records received and created in the course of responding to Citizenship queries regarding an individual's citizenship status and providing confirmation and denial products.</p> <p>Records received and created in the course of responding to queries regarding the issuing of Birth, Death and Marriage certificates, also Non-Disclosure Directions and issuing of Certificates of No Impediment (CONI) to Marriage or Civil Union.</p> <p>Records received and created in the course of responding to queries regarding the issuing of passports.</p>	<p>Records created and received in the course of responding to Citizenship queries regarding an individual's citizenship status and providing confirmation and denial products.</p> <p>Records created and received in the course of responding to queries regarding the issuing of Birth, Death and Marriage certificates, also Non-Disclosure Directions and issuing of Certificates of No Impediment (CONI) to Marriage or Civil Union.</p> <p>Records created and received in the course of responding to queries regarding the issuing of passports.</p> <p>Records created and received in the course of responding to queries from individuals regarding use of the Identity</p>

		Check Service to confirm their identity.
<b>Retention Period</b>	2 years from last information entry date	No change
<b>Disposal Action</b>	Destroy	No change
<b>Justification</b>	The new Identity Check Service may have some records of communications with individuals who use or wish to use the Identity Check Service to confirm their identity. They have similar business value to communications about other identity services.	