



INFORMATION MATCHING BULLETIN

June 2005

Information Matching Newsletter from the Privacy Commissioner

Ministry of Justice (Collections) act on data matching issue

In the report of the Privacy Commissioner for the year ended June 2003, concern was expressed at the very high level of challenges (up to 35%) resulting from the information matching programmes involving the then Department for Courts. The purpose of the matching programmes is to locate fine defaulters by obtaining more up to date address details from IRD and MSD databases.

As a result, the Ministry of Justice (the Department for Courts was amalgamated with the Ministry in October 2003) started an investigation into this significant reporting issue. What followed was a detailed and exhaustive analysis of where the underlying issues were. The Collections Unit within the Ministry had no benchmark from which to compare the challenge results as the match only started in 2002. The Collections investigation covered the entire process from the initial call by a client to the end reporting to this office of their data matching operation.

Starting at the front end, Collections went to its contact centre staff and surveyed what was happening to frontline staff. The staff input was valuable as it showed that the level of

challenges being reported through the automated reporting systems was definitely not in line with their actual experience.

Collections found that the Deal Recording System (DRS), the Call Centre management system that, among other things, records details of inbound and outbound calls, was recording some accesses to a defaulter's profile as a challenge even if no challenge was received. Also, accessing a profile even after the period for a valid challenge was over was counted as a challenge in some instances. The "over reporting" of challenge information then passed on to their main processing database (Trace Management System or TMS) and finally to their main storage database (Data Warehouse).

The "over reporting" problem was occurring against a backdrop of on-going systems changes, including the imminent implementation of new data matching software and a Data Warehouse. With all this in mind, Collections decided to implement an interim manual reporting system outside of the DRS/TMS/Data Warehouse interface.

Match data is still generated and recorded in the operational systems. However, a new specially-designed query was generated from "Collect" (the

Ministry's fines database) to provide the necessary breakdown of match results.

To support the interim system, detailed and well-instructed on-line support tools were developed for the Contact Centre staff so that challenges could be manually recorded. The on-line tools guide the staff in identifying if the caller has been data matched and if they are challenging the details of the match. They are then guided through a series of step-by-step process instructions for reporting the type of challenge and the outcome of the challenge.

Following implementation of these processes, it was found that the level of challenges was actually much lower than earlier thought. Collections have yet to implement their new Trace software and continue to use manual processes to report to this office.

To their credit Collections saw that they had a significant problem and acted to identify what could have been a serious data quality issue. There is still work to be done before more automated systems are in place. In the meantime, Collections have in place robust and well-documented manual processes.

PANZA+ meeting

Last month, the Privacy Commissioner hosted the 23rd PANZA+ (Privacy Agencies of NZ and Australia plus Hong Kong, Korea) meeting. Day one participants comprised State and Federal Privacy Commissioners from Australia and Hong Kong, the Commonwealth Attorney-General's Department and NZ Office of the Privacy Commissioner staff.

Additional invited guests from the State Services Commission, Ministry of Justice, ESR (Institute of Environmental Science and Research), Police and the

Director of Human Rights Proceedings participated on the second day.

Discussion topics included identity management and authentication in relation to E-Government, identity theft, cross border flows of information and RFID (Radio Frequency Identification).

Victorian Privacy Commissioner publishes a Public Sector Data Matching Audit

Published in February, this report is available by visiting the Privacy Victoria website at www.privacy.vic.gov.au. The report was their first attempt to scope the data matching activities of state and local government in Victoria since the Information Privacy Act (IPA) came into force in September 2002. The audit results were based on a detailed survey that included a representative sample of different organisations.

Unlike NZ, the IPA does not have a specific section devoted to information matching. Their matching activity is currently covered by their generic IPP's (Information Privacy Principles). The Commissioner also has the power to issue a Code of Practice to regulate data matching activity. Interestingly, the Victorian Privacy Commissioner points to the New Zealand legislative example as a useful statutory example that is likely to better serve Victoria's needs.

FTC Report to Congress on Credit Reporting

The Federal Trade Commission published a Report to Congress on credit reporting last December. A significant part of the report deals with data matching. The report delves deeply into issues such as data quality, accuracy and completeness, match efficiency, partial matching and the use and

combination of unique identifiers in matching.

This report has some interesting comments to make such as

“Matching on more elements does not always guarantee a better match” and “Some identifiers are more discriminating than others”.

This report is a “valuable and interesting read” for anyone involved in the data matching field. It can be accessed at

<http://www.ftc.gov/reports/index.htm>

The report is listed as “Under Section 318 and 319 of the Fair and Accurate Credit Transaction Act of 2003” which is the second item under the 2004 report section.

Publications

There are a number of publications and reports available from the Privacy Commissioner that may be of interest to those involved in information matching. These are listed on the Privacy Commissioner’s web site at:

<http://www.privacy.org.nz>

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