

# **New Zealand Traveller Declaration**

## **Maritime Technical Solution for Small Craft, Commercial and Specialist vessels**

### **PRIVACY IMPACT ASSESSMENT**

August 2023

V.1.1

Epic owner:



Product Owners:



PROACTIVELY RELEASED

## Contents

Document management.....	2
Version history .....	2
Distribution list for external distribution.....	2
Glossary.....	3
1. Introduction and purpose .....	6
2. PIA scope.....	9
3. Executive risk summary .....	9
4. Openness and transparency .....	10
5. Personal information captured.....	10
6. Assessment of privacy impacts.....	11
6.1 Collection of personal information.....	11
6.2 Storage and security .....	14
6.3 Access, correction and accuracy; Retention, use and disclosure; Offshoring of information; Unique identifiers .....	15
7. Risk, consultation and signature .....	16
7.1 Consultation.....	16
7.2 Signatures .....	16
Appendix 1 – Small Craft, Commercial and Specialist vessels Models.....	17
Small Craft, Commercial and Specialist vessels Traveller Journey .....	17
Small Craft Traveller Proposed Solution .....	18
Commercial Craft Traveller Proposed Solution .....	19
Appendix 2 – Project risks and controls table .....	20
Appendix 3 – Changes since version 1.0.....	21

## Document management

### Version history

Version	Date	Author and role	Description
0.1	15/04/23	██████████ Lead Business Analyst	Initial draft
0.2	20/04/23	██████████ Privacy Analyst	Redrafted following internal changes project team
0.3	27/04/23	██████████ Privacy Analyst	Updated to reflect feedback from Business Analysis Lead
0.4	04/05/23	██████████ Privacy Analyst	Updated to reflect feedback from Principal Privacy Advisor (ISP)
0.5	04/05/23	██████████ Privacy Analyst	Updated to reflect feedback from Epic owner - maritime
0.6	11/05/23	██████████ Privacy Analyst	Updated to reflect feedback from Product Owners
0.7	24/05/23	██████████ Privacy Analyst	Updated to reflect feedback from partner agencies
0.8	15/06/23	██████████ Privacy Analyst	Updated to reflect feedback from Epic owner - maritime
1.0	03/07/23	██████████ Privacy Analyst	Final & signed version  This is the version signed by Principal Privacy Advisor, Product Owner, Programme Manager and Programme Manager.
1.1	18/08/23	██████████ Privacy Analyst	Small editing changes – see <a href="#">Appendix 3</a>

### Distribution list for external distribution

Version # sent	Date sent	Recipient email address	Reason for sending
0.6	12/05/23	██████████	Feedback

0.6	12/05/23		Feedback
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### Disclaimer and assumptions

This PIA has been prepared by the New Zealand Customs Service - Te Mana Ārai o Aotearoa (Customs). Customs is the lead agency for the New Zealand Traveller Declaration and works closely with Ministry of Business, Innovation and Employment (MBIE) and Ministry for Primary Industries (MPI) to deliver the online system.

This PIA has been prepared to review the privacy implications of the Maritime Technical Solution for Small Craft, Commercial and Specialist vessels and whether this complies with the Privacy Act 2000 and related Information Privacy Principles.

This PIA reflects the operation of the Maritime Technical Solution for Small Craft, Commercial and Specialist vessels as it is currently envisaged. It is intended to be a “living document” and will be regularly updated to reflect changes that arise as the NZTD is progressively rolled out and adapted to respond to changes in the broader environment.

Updating the PIA to reflect changes will be the responsibility of the Epic Owner and Product Owners.

A version of this PIA will be made publicly available alongside the communication collateral deployed with the NZTD. This will support the public to understand the collection, storage, use and sharing of personal and third-party information. This is a transparency decision, intended to support public trust in the operation of the NZTD.

### Glossary

Abbreviation	Meaning
ANA	<p>Advance Notice of Arrival</p> <p>The person in charge of a craft that is en-route to New Zealand (from a point outside New Zealand) must, within the prescribed time, provide Customs with an advance notice of arrival, unless otherwise approved by the chief executive.</p>
API	<p>Advance Passenger Information</p> <p>For security reasons, most countries require airlines to provide details about their passengers before they travel. This is known as Advance Passenger Information (API).</p>
APP	<p>Advance Passenger Processing</p> <p>If notified of the requirement to do so, airlines must provide Advance Passenger Processing information to the Chief Executive of MBIE (Immigration NZ) about every passenger and crew member on their flights coming to or leaving New Zealand.</p>

BDF	<p>New Zealand Traveller Declaration - Border Decision Framework</p> <p>A framework that sets in motion a risk assessment of travellers to New Zealand. BDF is an assessment of a traveller declaration against rules; it does not do the actual risk assessing itself.</p>
Biometric information	<p>Biometric information, in relation to a person, means information that comprises—</p> <p>(a) 1 or more of the following kinds of personal information:</p> <ul style="list-style-type: none"> <li>(i) a photograph of all or any part of the person’s head and shoulders;</li> <li>(ii) impressions of the person’s fingerprints;</li> <li>(iii) a scan of the person’s irises; and</li> </ul> <p>(b) an electronic record of the personal information that is capable of being used for biometric matching</p>
Border agencies	<p>The border agencies are New Zealand Customs Service, Ministry for Primary Industries for Biosecurity New Zealand and the Ministry of Business, Innovation and Employment for Immigration New Zealand.</p>
Category of information	<p>Section 304 of the <b>Customs and Excise Act 2018</b> defines two categories of information in regards to disclosures:</p> <p><i>Category 1 information</i> means any information held by Customs,—</p> <ul style="list-style-type: none"> <li>a) including information relating to— <ul style="list-style-type: none"> <li>(i) persons;</li> <li>(ii) goods;</li> <li>(iii) craft; but</li> </ul> </li> <li>b) excluding Category 2 information</li> </ul> <p><i>Category 2 information</i> means—</p> <ul style="list-style-type: none"> <li>a) the following information in relation to any person: <ul style="list-style-type: none"> <li>(i) arrival and departure information;</li> <li>(ii) biometric information;</li> <li>(iii) passenger name record information; and</li> </ul> </li> <li>b) intelligence assessments and reports generated by Customs</li> </ul> <p>Section 41A of the <b>Biosecurity Act</b> refers to the following definition of border information:</p> <p>border information—</p> <p>(a) means information—</p> <ul style="list-style-type: none"> <li>(i) that is required to be supplied to the Ministry or the Customs by or under this Act or the Customs and Excise Act 2018, or both, for a border protection purpose; or</li> <li>(ii) that is otherwise lawfully supplied or collected for a border protection purpose; and</li> </ul>

	<p>(b) includes, without limitation, information about—</p> <ul style="list-style-type: none"> <li>(i) goods, persons, or craft:</li> <li>(ii) import or export transactions:</li> <li>(iii) importers or exporters; and</li> </ul> <p>(c) also includes data or information that is derived from, or related to, any information referred to in paragraphs (a) and (b) or any analysis of that information</p>
Commercial vessels	Predominantly fishing and cargo vessels; approx. between 30.000-90.000 individual crew members arriving in New Zealand per annum (depending on the size and complexity of the vessel). Approx. 3000 crew members will be permanently disembarking commercial vessels per annum, and therefore subject to requirements of NZTD.
Customs	New Zealand Customs Service - Te Mana Ārai o Aotearoa
CusMod	Customs' primary system for border management that records every movement of passengers, goods and craft across New Zealand's border. CusMod processes advanced passenger, goods and craft information to facilitate legitimate trade and travel.
DIA	Department of Internal Affairs - Te Tari Taiwhenua
DOB	Date of birth
INZ	Immigration New Zealand, a part of the Ministry of Business, Innovation, and Employment
IPP	Information privacy principle under <a href="#">section 22</a> of the Privacy Act
MBIE	Ministry of Business, Innovation and Employment - Hīkina Whakatutuki
MoH	Ministry of Health, Manatū Hauora
MPI	Ministry for Primary Industries – Manatū Ahu Matua
NZeTA	<p>New Zealand Electronic Travel Authority</p> <p>An electronic visa waiver allowing eligible citizens to travel to New Zealand for tourism, business, or transit purposes.</p>
NZTD	New Zealand Traveller Declaration
Personal information	<p>Personal information</p> <p>(a) means information about an identifiable individual; and</p> <p>(b) includes information relating to a death that is maintained by the Registrar-General under the Births, Deaths, Marriages, and Relationships Registration Act 1995 or any former Act (as defined in section 2 of the Births, Deaths, Marriages, and Relationships Registration Act 1995)</p>



PIA	<p>Privacy Impact Assessment</p> <p>A tool used by agencies to help identify and assess the privacy risks arising from the collection, use or handling of personal information. A PIA will also evaluate ways to reduce privacy risks.</p>
PNR	<p>Passenger Name Record – generated at the time of the booking and consists of the passenger's personal and journey details.</p>
Pre-travel manifest	<p>A manifest is a document listing the cargo, passengers, and crew of a ship, or aircraft for the use of customs and other officials. Where such a list is limited to identifying passengers, it is a passenger manifest or passenger list.</p>
Primary line	<p>The primary line is the point in the arrivals hall where the traveller presents their passport to either an officer at the booth or an eGate. This is also the point where an application for a visa and/or entry permission may be made.</p>
Privacy Act	<p>Privacy Act 2020</p>
Secondary line	<p>A place where travellers may be directed for further interaction with a border officer because an assessing officer considers further questioning or an inspection is required.</p>
Small craft	<p>A variety of small craft and super yachts visiting New Zealand; approx. 600 small craft bring 3000 passengers to New Zealand per annum.</p>
Specialist vessels	<p>Specialist vessels – a variety of commercial craft such as research, cable laying, gas and oil exploration – a very small cohort of arrivals.</p>
TJI	<p>New Zealand Traveller Declaration - Traveller Journey Index</p> <p>The TJI is a centralised data orchestration system. The TJI records references to data stored in their proprietary systems. It captures the references for a unique journey record for a single journey made by a traveller. It is the core system component that assesses and authorises other parts of NZTD to risk assess the traveller upon reaching New Zealand, prior to being processed at the Primary Line. TJI does not process any data itself.</p>
Third-party information	<p>Information collected by an entity that does not have a direct relationship with the user the data is being collected on.</p>
UI	<p>User Interface</p>

## 1. Introduction and purpose

This Privacy Impact Assessment (PIA) will assess NZTD's Maritime Technical Solution for Small Craft, Commercial and Specialist vessels and whether this complies with the Privacy Act and related Information Privacy Principles (IPPs). It explains the process followed, the factors considered and the steps that will be taken to ensure the privacy of travellers to New Zealand will not be adversely affected by the use of this Maritime Technical Solution.

The New Zealand Traveller Declaration (NZTD) is an online system for travellers to complete a digital traveller declaration before they travel to New Zealand and answer questions for Customs, Immigration and Biosecurity<sup>12</sup>. The NZTD will be an alternative to the paper-based passenger arrival card.

The aim is to modernise the border and improve the safety and security of New Zealand by being able to assess passenger information earlier in their journey. This will support increased compliance among passengers and the ability to identify non-compliant passengers earlier.

It is estimated that by 2025, more than 18 million travellers will have used NZTD across air and maritime ports.

The NZTD will be an alternative to the paper-based passenger arrival card, i.e., the NZTD will be the online form of the current paper-based passenger arrival card. With the introduction of NZTD, maritime travellers will be able to complete and submit their declaration no more than 24 hours before departing from their last international port of departure.

This PIA covers the variations to operational processes and systems necessary for NZTD to support Small Craft, Commercial and Specialist vessels in the maritime environment.

Small Craft	A variety of small craft and super yachts visiting New Zealand; approx. 600 small craft bring 3000 passengers to New Zealand per annum.
Commercial vessels	Predominantly fishing and cargo vessels; approx. between 30,000-90,000 individual cargo crew members arriving in New Zealand per annum (depending on the size and complexity of the vessel). Approx. 3000 crew members will be permanently disembarking commercial vessels per annum, and therefore subject to requirements of NZTD.
Specialist vessels	Specialist vessels – a variety of commercial craft such as research, cable laying, gas and oil exploration; a very small cohort of arrivals.

These vessels may not have internet access prior to arrival, limiting opportunities for informative correspondence. Border Officers meeting such vessels may carry dedicated digital devices (such as an Ipad) for travellers to complete a digital traveller declaration with if they have not done so in advance of going ashore. The digital support devices will access the web-based digital traveller declaration, rendered for a mobile<sup>3</sup> or tablet screen.

For Small Craft, Commercial and Specialist vessels there is little to no change to the current process when these arrive in New Zealand and travellers have to fill out a paper-based passenger arrival card, except that traveller processing will now be carried out digitally.

<sup>1</sup> There are currently no Ministry of Health (MoH) requirements active in NZTD but the processes and systems have been established to enable the management of health requirements at the border to minimise health risks as we saw during the recent COVID-19 pandemic.

<sup>2</sup> The arrival card serves multiple purposes for multiple border agencies.

<sup>3</sup> The maritime mobile app is not in scope for go-live.



## Initiative overview

### Context for the project

Travellers to New Zealand can arrive by different modes of transport: people can arrive by air, as commercial crew, small craft passengers, by cruise boat and/or on NZ military craft<sup>4</sup>.

The digital traveller declaration<sup>5</sup> will be similar for travellers arriving by Small Craft, Commercial and Specialist vessels as for travellers arriving by air, but the way that these travellers are being processed on arrival in New Zealand will be different.

For people travelling by Small Craft, Commercial and Specialist vessels, people stay on board the vessel until they are cleared by Customs, Immigration and Biosecurity. Border officers will attend the vessel, carrying a 'shared' device (such as an Ipad) to allow travellers to make a digital traveller declaration on board the vessel. If the traveller has their own device, they can use it to complete their NZTD declaration; alternatively, the paper-based passenger arrival card will still be available for use as well.

A submitted digital traveller declaration is valid for the entire journey within New Zealand as the vessel visits multiple ports.

Appendix 1 shows the models for the commercial and small craft journey, the small craft traveller proposed solution and the commercial craft traveller proposed solution.

Travellers arriving by *Small Craft, Commercial and Specialist vessels* will be able to submit their NZTD no earlier than 24 hours prior to the scheduled departure from the last foreign port.

### Issues this project will address:

- A more efficient operational process for both border officers and travellers by Small Craft, Commercial and Specialist vessels upon arrival.
- With the digital solution for Small Craft, Commercial and Specialist Vessels, it will be possible to assess the risk of the traveller without a need to onboard the vessel.

### Benefits it will bring to border agencies:

- Enables the border agencies to assess the risk of maritime travellers arriving by Small Craft, Commercial and Specialist vessels.
- A more efficient process to assess the risk of maritime travellers arriving by Small Craft, Commercial and Specialist vessels.

### Benefits to others:

- A more efficient process for travellers arriving by Small Craft, Commercial and Specialist vessels.

#### Key privacy lessons learned from NZTD trials

So far, no trials to support the operational processes and systems necessary for small craft, commercial and specialist vessels in the maritime environment have taken place.

<sup>4</sup> For more information on NZTD for cruise passengers and New Zealand military craft, please refer to the PIA maritime solution for cruise and New Zealand military craft.

<sup>5</sup> For more information on the NZTD, please refer to the PIA Digital Traveller Declaration.

## 2. PIA scope

This PIA will focus on the variations to operational processes and systems necessary for NZTD to support small craft, commercial and specialist vessels in the maritime environment.

The digital traveller declaration will be similar<sup>6</sup> for all travellers, regardless of whether they arrive by air or by maritime port. This PIA will focus on the *processing* of travellers arriving by Small Craft, Commercial and Specialist vessels; not on their digital traveller declaration. For information on the privacy impact of the digital traveller declaration, please refer to the PIA Digital Traveller Declaration.

This PIA will not cover:

- The privacy impact of the broader NZTD programme, incl. the choice of strategic direction of the NZTD, the policy analysis or legislative settings that reflect that direction.
- The privacy impact of the digital traveller declaration<sup>7</sup>.
- The privacy impact on cruise passengers and New Zealand military craft<sup>8</sup>.
- The privacy impact of the Traveller Journey Index<sup>9</sup>.
- The privacy impact of the Border Decision Framework<sup>10</sup>.
- The privacy practices of the participating agencies, e.g. MPI and INZ.

## 3. Executive risk summary

A risk-based approach to the Maritime Technical Solution for Small Craft, Commercial and Specialist vessels is being taken. We believe that the Maritime Technical Solution for Small Craft, Commercial and Specialist vessels best meets our needs, in the most cost-effective way, while providing adequate privacy and security protections.

The following residual risks have been identified. Controls have been put in place or are still under development. A detailed description of risks and controls can be found in Appendix 2, Project Risks and Controls table.

		Consequence				
		Insignificant	Minor	Moderate	Major	Severe
Likelihood	Certain					
	Likely					
	Possible		R2	R1		
	Unlikely					
	Rare					

<sup>6</sup> The difference between air and maritime will be how a traveller's journey will be identified. E.g. by air or by maritime port.

<sup>7</sup> Please refer to PIA Digital Traveller Declaration.

<sup>8</sup> Please refer to the PIA maritime solution for cruise and New Zealand military craft.

<sup>9</sup> Please refer to PIA Traveller Journey Index.

<sup>10</sup> Please refer to PIA Border Decision Framework.

\* **R3 - Risks in regard to IPP 5 - Storage and security of personal information** - The NZTD cyber security team assessed the security risks for the Maritime Technical Solution for Small Craft, Commercial and Specialist vessels and is responsible for the Certification & Accreditation (C&A) process and security risk assessment. For more information on security risks, please refer to the security C&A.

## 4. Openness and transparency

IPP 3 of the Privacy Act requires agencies to be open and transparent about the way they manage personal information. To meet these openness and transparency obligations, we will:

- Make this PIA public.
- Have a NZTD privacy statement (<https://www.travellerdeclaration.govt.nz/privacy/>) that will explain how the border agencies will collect, use and disclose personal information travellers will provide through the NZTD online form.
- Engage where required and appropriate with anyone who has particular concerns with the use of the maritime technical solution for Small Craft, Commercial and Specialist vessels.
- Have a dedicated website for NZTD - <https://www.travellerdeclaration.govt.nz/>

## 5. Personal information captured

The digital traveller declaration for travellers arriving by Small Craft, Commercial and Specialist vessels and the digital traveller declaration for air travellers will be similar. The difference will be how a traveller's journey will be identified, e.g. by air or by maritime port.

NZTD for Small Craft, Commercial and Specialist vessels will capture the following personal information:

- Mode of travel – Air/Sea
- Name of a traveller (given, last and preferred name)
- Date of birth
- Country of birth
- Nationality
- Passport Number
- Email address
- Contact Number
- Vessel type
- Date of arrival in New Zealand
- Departure port
- Date of departure
- Port of arrival
- Contact or residential address
- Occupation
- Travel history
- Purpose for travel
- Vessel name<sup>11</sup>

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<sup>11</sup> The difference between air and maritime will be how a traveller's journey will be identified. E.g. by air or by maritime port.



- Are you permanently disembarking – Yes/No<sup>12</sup>

Information about items the traveller is carrying, and their recent activities, is also collected.

If a third party fills out the NZTD on behalf of a traveller, their name and contact details will also be collected.

## 6. Assessment of privacy impacts

This section advises on the privacy impacts of NZTD's *maritime technical solution for Small Craft, Commercial and Specialist vessels* in consideration of the IPPs of the Privacy Act.

### 6.1 Collection of personal information

#### IPP 1 - Purpose of collection of PI

1. The NZTD privacy statement that travellers will see and have to accept before beginning their digital traveller declaration will explain how border agencies will collect and use the personal information travellers will provide through the NZTD online form. The privacy statement is also available on the dedicated website for NZTD (<https://www.travellerdeclaration.govt.nz/privacy>).
2. The risks and controls associated with this IPP is the same for travellers arriving by Small Craft, Commercial and Specialist vessels as for travellers arriving by air. This is covered in the PIA on the Digital Traveller Declaration.

#### IPP 2 – Source of personal information

IPP 2 of the Privacy Act requires that an agency shall collect information directly from the individual concerned, unless an exception applies. Broadly, the exceptions under IPP2(2) are:

- (a) that non-compliance would not prejudice the interests of the individual concerned;
- (b) that compliance would prejudice the purposes of the collection;
- (c) that the individual concerned authorises collection of the information from someone else;
- (d) that the information is publicly available;
- (e) that non-compliance is necessary to avoid prejudice to maintenance of the law, for the enforcement of a pecuniary penalty law, for the protection of public revenue, for the conduct of court or tribunal proceedings, or to prevent or lessen a serious threat to the life or health of an individual; or
- (f) that compliance is not reasonably practicable in the circumstances of the particular case.
- (g) that the information will not be used in a form in which the individual concerned is identified or will be used for statistical/research purposes and not published in a form that could reasonably be expected to identify the individual concerned.

<sup>12</sup> The response to this answer will determine which questions will be made available and need to be answered by the traveller. If the traveller is not disembarking, some questions will not be applicable, e.g. not all travellers will see Immigration questions when they complete the digital traveller declaration if these questions do not apply to their circumstances. An advantage of this is that it minimises the risk of overcollection.

3. *Describe whether information will be collected directly from the individual.*

A traveller can provide the details directly or they can nominate a delegate on their behalf to complete a traveller declaration.

- Children under the age of 18 will also need to fill out a digital traveller declaration and the parents/ legal guardians can do this on the child's behalf.
- People who are impaired in some way (e.g. age, language, mental capacity, physical capacity) may be supported by a nominated delegate to fill out a digital traveller declaration.

4. *Describe whether an exception applies etc.*

Where a traveller is unable to use a technology or does not have access to the technology, a traveller can nominate a delegate to submit a declaration on their behalf. For more information on this, please refer to the PIA Digital Traveller Declaration.

Traveller declarations can be filled out by the ship's master, as long as this is with consent of the traveller/crew<sup>13</sup>. If the traveller declaration is filled out by a third party (e.g. the ship's master), this delegate is required to confirm they have the authorisation of the traveller and provide their own name and email address.

Where Small Craft, Commercial and Specialist vessels arrive in New Zealand without having had access to the internet in order to complete a declaration, border officers may provide arriving travellers with a digital device on which to complete a declaration. The paper-based passenger arrival card will continue to be available, alongside the digital devices.

5. *State any risks.*

If the ship's master fills out the declarations on behalf of his crew, there is a risk that:

- the ship's master may not be fully aware of the contents of the crew luggage and/or personal information and fills out the declaration incorrectly.
- the ship's master would fill out 'nothing to declare' for all questions for matters of efficiency / trying to get the crew processed as fast as possible.

6. *State any policies / processes that may need to be developed to achieve or maintain consistency and/or mitigate risks.*

The digital traveller declaration requires delegates/third parties/ ship's masters to confirm they have the consent of the traveller before they fill out the declaration. There is the potential for infringement notices under the border agencies' legislation for knowingly filling out digital traveller declarations incorrectly (for both traveller and third party).

There will be communication and other advisory notices discouraging knowingly filling out digital traveller declarations incorrectly for efficiency reasons.

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<sup>13</sup> Please note that NZTD does not offer a bulk upload functionality at the moment, which could be considered beyond the go-live of NZTD.

### IPP 3 – Collection of information from subject

7. The risks and controls associated with this IPP is the same for travellers arriving by Small Craft, Commercial and Specialist vessels as for travellers arriving by air. This is covered in the PIA on the Digital Traveller Declaration.

### IPP 4 – Manner of collection

Under IPP 4(1) Personal information shall only be collected by an agency

- (a) by lawful means; and
- (b) in the circumstances of this project, are by means that are
  - (i) fair, and
  - (ii) do not intrude unreasonably on the personal affairs of the individual concerned.

Particular care should be taken with regard to collection of personal information from children or young persons.

8. *Describe whether the collection is lawful, fair and not unreasonably intrusive (note - if an element is not met, it will be a risk).*

Border agencies have the legal authority to collect this personal information for the purpose of managing New Zealand borders.

Online systems and mobile apps are not an unreasonably intrusive means of collecting personal information. Traveller can use their own devices to fill out the traveller declaration or these travellers can use a public digital support device if a border officer has one available for this purpose. The paper-based passenger arrival card will also continue to be available.

The NZTD will only be available in English and te reo Māori on go-live<sup>14</sup>. In particular for commercial craft, some crew will only have only a basic understanding of the English language. This could limit the level of fairness these people experience.

The paper-based passenger arrival card will be available for those who are unable or unwilling to complete a digital traveller declaration and unable or unwilling to have their declaration completed by a third party on their behalf.

9. *State any risks (eg, if non-provision of information will result in the individual being unable to access the services – explain why this is not unfair in the circumstances).*

The NZTD will only be available in English and te reo Māori on go-live<sup>15</sup>. In particular for commercial craft, some crew will only have only a basic understanding of the English language. This could limit the level of fairness these people experience.

10. *State any policies / processes that may need to be developed to achieve or maintain consistency / mitigate risks.*

n/a

<sup>14</sup> Answers to the questions need to be provided in English, as per the current legislation.

<sup>15</sup> Answers to the questions need to be provided in English, as per the current legislation.



## 6.2 Storage and security

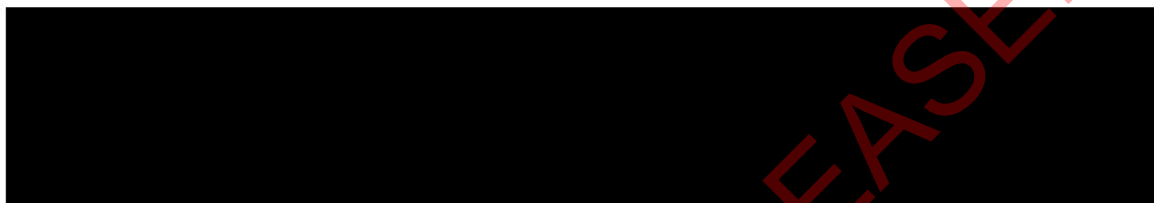
### IPP 5 – Storage and security of personal information

IPP 5(a) An agency holding personal information must ensure that information is protected by such security safeguards as are reasonable in the circumstances, against:

- loss;
- unauthorised access, use, modification or disclosure; and
- other misuse.

IPP 5(b) This is also required when the information is transferred to a third party.

11. Describe security compliance including the security safeguards that will be in place.



Security Certification and Accreditation will be undertaken by the NZTD Cyber Security Team. This process involves third party review of security controls and penetration testing.

The NZTD cyber security team follows a 'secure by design' approach for NZTD, complemented by engaging an independent external third party to perform and complete penetration testing and configuration reviews.

Border officers may take a portable device on board the vessel for travellers to fill out the digital traveller declaration:

- The browser will run InPrivate browsing mode.
- Any user will have the ability to initiate a temporary session without the need for a username or password by tapping Guest at the login screen.
- When a guest logs out, all their data — including browsing history — is deleted from the portable device.
- It will not contain any previous user data and all session data is cleared when the browser is closed.
- The device will not have access to any of the agencies' networks or services.
- Internet access will be restricted to allow users to complete a digital traveller declaration and access necessary services such as webmail for completing their digital traveller declaration (e.g. to retrieve the reference number).
- Users will not be able to sign into Apple services such as the App store or Messenger.
- Device time-out settings will force log-out and remove all session data.
- Border officers carrying these portable devices will be trained to check and ensure the traveller has logged-out of the device before handing the device over to another traveller.

12. Describe how these are reasonable in the circumstances.

A 'secure by design' approach is considered best practice.

13. State any risks here (eg, 3<sup>rd</sup> party access, unsecured information etc).

The NZTD cyber security team assessed the security risks for the maritime solution for Small Craft, Commercial and Specialist vessels and is responsible for the Certification & Accreditation (C&A) process and security risk assessment. For more information on security risks, please refer to the security C&A.

14. *State any policies / processes that may need to be developed to achieve or maintain consistency and/or mitigate risks.*

See previous comment.

15. *If a 3<sup>rd</sup> party platform is to be used, what:*

██████████

### 6.3 Access, correction and accuracy; Retention, use and disclosure; Offshoring of information; Unique identifiers

IPP 6 – Access to personal information
IPP 7 – Correction of personal information
IPP 8 – Accuracy of personal information to be checked before use
IPP 9 – Agency not to keep personal information for longer than necessary
IPP 10 – Limits on use of personal information
IPP 11– Limits on disclosure of personal information
IPP 12 – Disclosure of personal information outside New Zealand
IPP 13 – Unique identifiers

16. The risks and controls associated with these IPPs is the same for travellers arriving by Small Craft, Commercial and Specialist vessels as for travellers arriving by air. This is covered in the PIA on the Digital Traveller Declaration.

## 7. Risk, consultation and signature

### 7.1 Consultation

Consultation team	Team member	Date consulted	Advice given	Advice incorporated
ISP	 Principal Privacy Advisor	3 May 2023	Feedback PIA	Yes

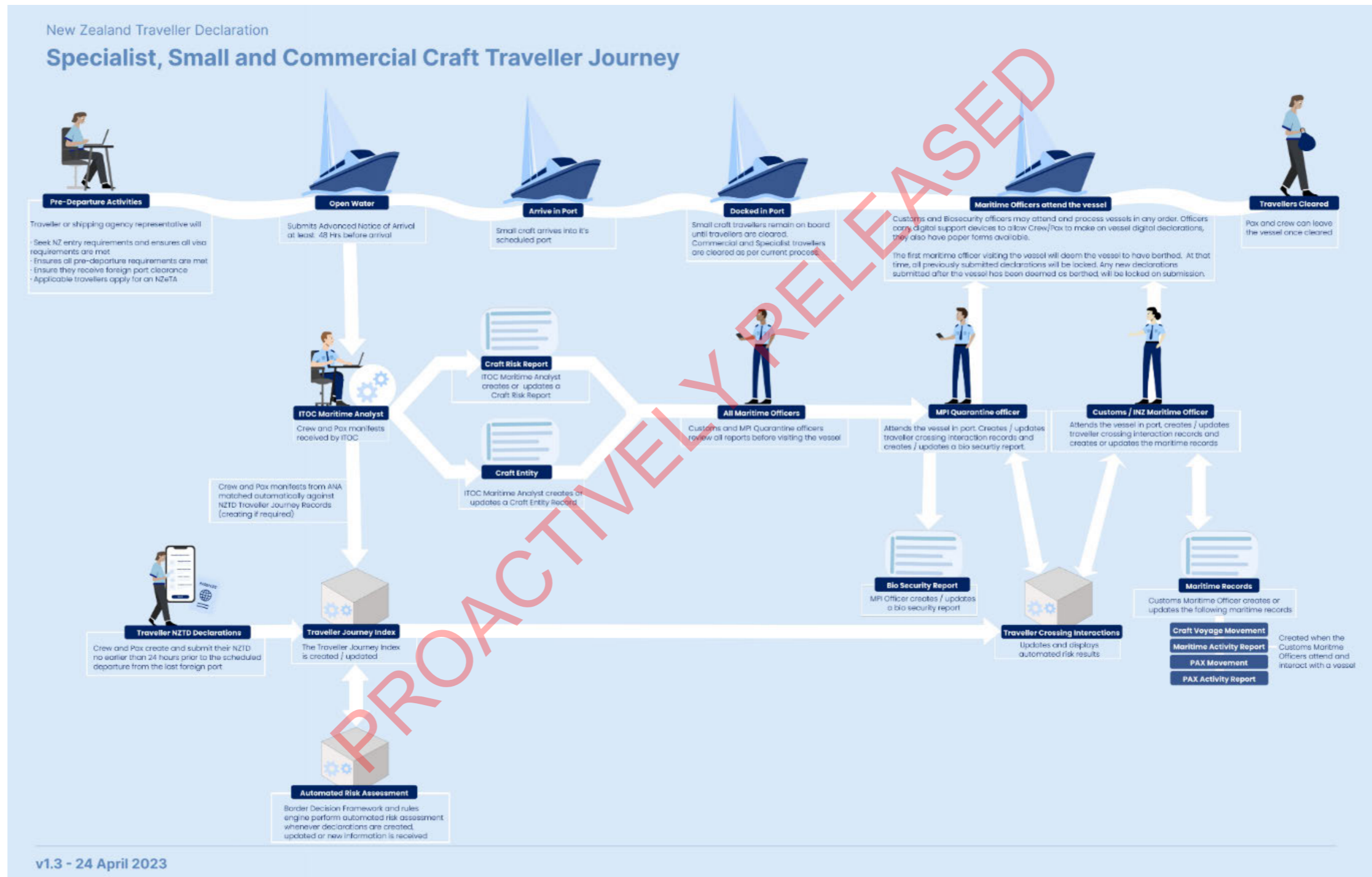
### 7.2 Signatures

Name and Position	Action	Signature	Date
Principa	<p>Please refer to version 1.0 for the signed version.</p>		
Epic ow and spe			
Product			
Programme Director NZTD			

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Appendix 1 – Small Craft, Commercial and Specialist vessels Models

Small Craft, Commercial and Specialist vessels Traveller Journey

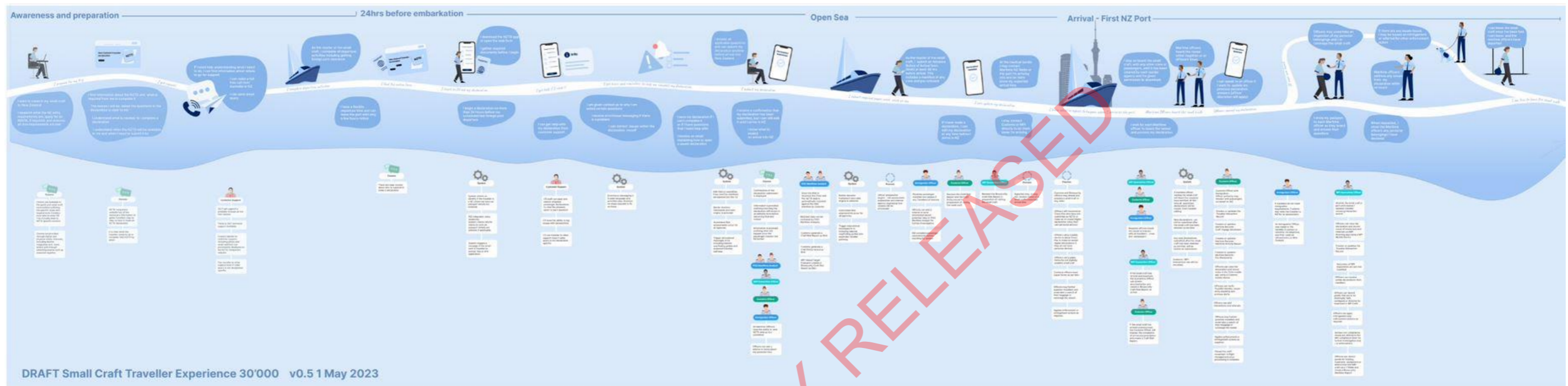




# Small Craft Traveller Proposed Solution

30'000ft View

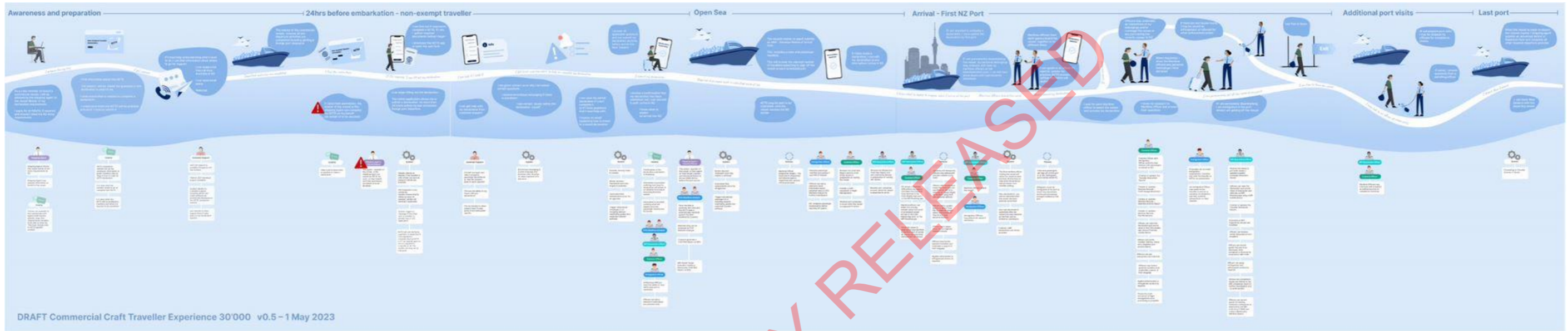
v0.5 1 May 2023



# Commercial Craft Traveller Proposed Solution

30'000ft View

v0.5 1 May 2023





## Appendix 2 – Project risks and controls table

Risk #	Risk rating	IPP	Reasoning	Mitigations / Controls	Residual risk
R1	medium	IPP2	<p>If a third party (e.g. ship's master) fills out the declarations on behalf of his crew, there is a risk that:</p> <ul style="list-style-type: none"> <li>the ship's master may not be fully aware of the contents of the crew luggage and/or personal information and fills out the declaration incorrectly.</li> <li>the ship's master would fill out 'nothing to declare' for all questions for matters of efficiency / trying to get the crew processed as fast as possible.</li> </ul>	<p>The delegate/third party/ ship's master is required to confirm they have the consent of the traveller.</p> <p>There will be communication and other advisory notices discouraging knowingly filling out digital traveller declarations incorrectly.</p> <p>The potential for infringement notices for knowingly filling out digital traveller declarations incorrectly (for both traveller and third party).</p>	low
R2	low	IPP4	<p>People with only a basic understanding of the English language could struggle with understanding and filling out the digital traveller declaration.</p>	n/a	low

## Appendix 3 – Changes since version 1.0

### PIA Maritime Technical Solution for Small Craft, Commercial and Specialist vessels

- Version 1.1 (August 2023)
  - Tidied up front page and contents page.
  - Section 7.2 (signatures) removed from version 1.1.
  - Removed Appendix with PIA Digital Traveller Declaration for clarity and version control purposes.
  - Appendix 3 (Changes since version 1.0) added.
  - Page numbers added.
  - Removed [REDACTED] as Product Owner.

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