

31 October 2024

s9(2)(a)

Mālō ni s9(2)(a)

RESPONSE TO AN OFFICIAL INFORMATION ACT REQUEST (REF: DOIA016-2024/25)

On 21 September 2024, you contacted the Ministry for Pacific Peoples (the Ministry) requesting under the Official Information Act 1982 (OIA), information relating to meta, facebook and other platforms at the Ministry. On 18 October we informed you via letter that an extension to your request was necessary due to the need to search through a large quantity of information. I have outlined your specific requests and my responses to each below.

- 1) *Does MPP pay for advertising services on the Facebook, Instagram, LinkedIn, Google, Tik tok or other digital platform?*
 - a) *If so, how much money has been spent, by year, on advertising on each of these platforms?*

The Ministry spent the following amounts on Meta advertising on Facebook in the past four financial years.

Description	FY 20/21 (\$)	FY 21/22 (\$)	FY 22/23 (\$)	FY 23/24 (\$)	Grand Total (\$)
Meta (Facebook)	144	715	2,167	100	3,126

Total costs for advertising, campaigns and publications for the past five financial years (2019/20 to 2023/24) are publicly available here: [Vote Pacific Peoples - Vol 9 Social Services and Community Sector - The Estimates of Appropriations 2024/25 - Budget 2024](#)

The Ministry experienced an increase in overall spending on advertising campaigns from the financial years 2020/21 to 2022/23 due to the mitigation and recovery of the impacts of COVID-19 on Pacific communities. This increase also supported emergency community engagements and translations for Pacific peoples during the 2023 North Island severe weather events. A small component of these campaigns included social media advertising to promote community events.

Providing a cost breakdown of spend on each advertising platform outlined in your request would necessitate a search through a large quantity of information, including identifying and separating each advertising platform outlined in your request. I am therefore refusing part of your request under section 18(f) of the OIA as the information requested cannot be made available without substantial collation or research, which would unreasonably interfere with our operations.

- b) *Does MPP use any agencies to place or manage that advertising, if so who?*
 - c) *If MPP uses any agencies to place or manage that advertising, what is (or are) the names of each of those agencies?*
 - d) *If MPP uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and MPP.*
- 2) *If MPP uses advertising services on digital platforms as above, does (or has) the agency created “custom audience” lists as part of those campaigns?*
- a) *If so, please provide a list of the custom lists that have been generate, including the number of people on that list and what market segmentation was being targeted by that campaign and the date for which each custom audience was generate, along with when these audience lists were uploaded to and to which platform?*
 - b) *If so, what privacy analysis was conducted prior to custom audience lists being generated?*
 - c) *If so, was the Minister responsible ever made aware that Ministry for Pacific Peoples was undertaking this activity? If so, which Minister was it, and when were they notified?*
 - d) *If so, what advice was sought prior to this activity taking place?*
 - e) *If so, what lawful basis does MPP rely on for this disclosure?*
 - f) *If so, what was the origin of the information that was included in these custom audience lists?*
 - g) *If so, did MPP receive any specific advice as to the efficacy of the security measures around these lists, if so, who provided this advice and when was it provided? Please provide copies of the advice provided.*
 - h) *If so, what security measures are used to protect the privacy of individuals?*
 - i) *If so, is MPP still generating and uploading custom audiences, or is this practice “on hold”. If it is on hold, when and why was it put on hold?*
 - j) *If so, can people “opt-out” of being included in these custom audience lists, and if so, how many people have done so?*
 - k) *If so, has MPP received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and any responses.*
 - l) *If so, did MPP consult with the Office of the Privacy Commissioner on this practise? If so, when?*
 - m) *If so, has MPP received any reports about the effectiveness of custom audience lists? If so, please provide these.*
 - n) *If so, for each upload of the custom audience lists to each platform, what percentage of these were “matched” against the current users of each platform?*
- 3) *Has any person from MPP had any meetings, whether in person, by videoconference or other method, with any rep. from Meta, Google, Linkedin, Tik Tok, or any other digital advertising platform in the last 12 months?*
- a) *If so, who was present during these meetings?*
 - b) *If so, please provide the agenda, notes, minutes, and any communications associated with those meetings.*
 - c) *Does MPP have a dedicated account manager with Meta, Google, Linkedin, Tik Tok or any other digital advertising platform. If, so what is the name of this person or the names of these people?*
- 4) *Please provide any correspondence, e-mail, document, or record held by MPP on the subject of custom audience lists, advertising on Meta, Facebook, Instagram, Google, Tik tok or any other platform for the period 1 September 2024 - 21 September 2024.*

No, the Ministry does not currently contract any agencies to run its social media activity, nor does it use custom audience lists as part of their advertising campaigns. The Ministry directly manage their advertising work by their in-house Communications staff.

The Ministry has not met with any representatives from Meta, Google, LinkedIn, Tik Tok, or any other digital advertising platform in the last 12 months. The Ministry does not have a dedicated account manager for any digital advertising platform, nor does it hold any correspondence within scope of your request.

Therefore, I am refusing part of your request under section 18(e) of the OIA, as the information requested does not exist.

In line with standard OIA practice, the Ministry proactively publishes some of its responses to OIA requests. As such, this letter may be published on the Ministry for Pacific Peoples' website. Your personal details will be removed, and the Ministry will not publish any information that would identify you or your organisation.

Should you wish to discuss this response with us, please feel free to contact the Ministry at: uia_requests@mpp.govt.nz.

If you are dissatisfied with this response, you have the right, under section 28(3) of the OIA, to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

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A handwritten signature in black ink, consisting of several overlapping, sweeping strokes that form a cursive, somewhat abstract shape.

Danilo Coelho de Almeida
Deputy Secretary,
Corporate and Support Services