



TE MANA  
RARAUNGA

Māori Data Sovereignty Network

## **Te Mana Raraunga Statement on Department of Internal Affairs facial recognition system procurement**

**14 October 2020**

### **Department of Internal Affairs facial recognition system procurement represents clear and significant risks to Māori Data Sovereignty**

The proposed processing of large-scale biometric data by an overseas agency (DXC Technology via its subsidiary) represents clear and significant risks to Māori Data Sovereignty and the wider community in Aotearoa.

Based on the information available so far, Te Mana Raraunga firmly believes that the Department of Internal Affairs' Privacy Threshold Assessment (PTA) on the proposed Facial Recognition System was conducted too late and lacks sufficient detail to justify its outcome. It should have, by all reasonable measures, resulted in a full and thorough Privacy Impact Assessment. This is due to the sheer scale of the proposed processing, and the potential privacy and security implications of the large-scale storage and processing of passports and their related biometric data.

Te Mana Raraunga is concerned that the proposed contractual controls and ability to audit DXC Technology's subsidiary are insufficient to adequately mitigate the risks that this platform poses to the people of Aotearoa and to Māori Data Sovereignty.

Issues with the accuracy of facial recognition technologies, particularly amongst racialised minority populations, are widely documented. So too are the risks and impacts of implementing new technologies without sufficient engagement, assessment, controls, and governance. If Aotearoa is to be a world leader in the trusted and ethical use of data, transparency and genuine engagement in decision-making is crucial. As a Crown agency, DIA has obligations to uphold the principles of te Tiriti o Waitangi and the principle of Free Prior and Informed Consent as set out in the United Nations Declaration on the Rights of Indigenous Peoples. Māori data governance over Māori data is critical, and our rights to be involved in all decisions that affect us need to be upheld.

Te Mana Raraunga urges the Department of Internal Affairs to move with urgency to conduct a full Privacy Impact Assessment. All stakeholders should have the opportunity to be consulted on the proposed Facial Recognition System and to consider whether the adoption of this technology is both acceptable and ethical.

**About Te Mana Raraunga:**

Te Mana Raraunga, the Māori Data Sovereignty Network, brings together more than 100 Māori researchers, practitioners and entrepreneurs across the research, IT, community and NGO sectors. TMR advocates for Māori rights and interests in data and for the development of Māori, iwi and hapū data infrastructure and capability.

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