

Privacy Statement – Border Workforce Testing Register

It is important to keep our border workforce safe and limit the opportunity for transmission of COVID-19 into our community. Border workers undergo regular testing, and will also be considered a priority group to receive a COVID-19 vaccination invitation. This statement describes how information about each border worker will be managed for the COVID-19 response, including testing, vaccination invitations and contact tracing.

Testing

The COVID-19 Public Health Response (Required Testing) Order 2020 (the Order) [COVID-19 Public Health Response \(Required Testing\) Order 2020](#) means that border workers described in the Order need to be regularly tested.

The Order also requires that employers or the agencies responsible for border workers (collectively called PCBUs) must keep and maintain a record of each worker's testing. In addition, workers are required to provide the necessary information to their PCBU.

The PCBU has decided that it is mandatory for its workers to have their information included in the Border Workforce Testing Register (the Register) as this is the method by which it will meet its obligations under the Order and under the Health and Safety at Work Act 2015. If the information is not provided and matched within the Register an employee may be refused entry to the border location managed by the PCBU, due to the serious threat posed to public health.

The Register is a secure database (developed by the Ministry of Health) that records and tracks worker testing. The Register will hold information about workers so that they and their PCBU will know when tests are due and that tests have been undertaken as required. The Register does not record the results of the test, nor the reason for which it was taken.

To enable the Register to match with test details of each worker, a National Health Index (NHI) number is needed. Each PCBU will provide the following information about each worker to enable an NHI match in Ministry of Health systems:

- full name
- date of birth
- address (optional)

The NHI recorded will not be visible to the PCBU.

Additional worker information that will be provided by the PCBU to the Register to enable testing to be monitored includes:

- the worker's PCBU name and contact details, worker number (optional) and work location
- the dates worked
- the worker's contact mobile number and (optional) contact email address (so workers can receive reminders)
- how often the worker needs to be tested (7days or 14 days)
- whether the worker has been exempted from testing.

The Register will match each worker's NHI against COVID-19 test results reported to the Ministry and confirm when a swab is taken and when the test result has been returned (but not what that result was). The Register will maintain a full record of tests completed for each worker since the Order came into force (30 August 2020), and will continue to do so on an ongoing basis.

Vaccination invitations and CIR recording

The PCBU will provide the name, date of birth, NHI, and mobile phone and email contact details recorded on the Register to the Ministry of Health COVID-19 Immunisation Register (CIR). This will enable each worker's information to be available when they present for a vaccination, and provide the ability for an invitation to be sent to each border worker to invite them to be vaccinated (once that facility becomes available on the CIR). The PCBU for the worker (and location if provided) will also be provided to the CIR so that reporting on numbers of workers vaccinated (but not identities) can be returned to the PCBU.

Each worker can choose whether to receive the vaccine, subject to any workplace requirements. The CIR information collection processes will provide the worker with information about their vaccination options, and also provide an opportunity to include household contacts in the priority vaccination group. More information about the CIR can be found [here](#).

Contact Tracing

In the event that a border worker tests positive for COVID-19, a contact tracer may access the contact details of the individuals at that workplace. This will help them to promptly contact any potential Close Contacts and provide them with necessary information.

Maintaining worker privacy

Keeping health information secure is important, so management of each worker's test result occurs outside of the Register. Each worker's information will be held and managed in accordance with the Privacy Act and Health Information Privacy Code.

Access to workers' information is limited to those PCBU staff authorised to see it. Access to the Register is limited to those with logon access rights, and all access is recorded and can be audited.

- Each PCBU will only be able to see information about their own workers on the Register (this may mean more than one PCBU if a worker attends multiple sites with different PCBUs).
- Under the Order enforcement officers will be able to request the PCBU to provide access to information held on the Register to check for compliance with the Order.

The Ministry of Health will have access to personal information on the Register only:

- when required to provide Register system support
- to match NHI numbers to assist with the testing process and enable swab dates to be shown in the Register
- to forward specified information to the CIR, to create a vaccination dataset within the CIR, with worker name, date of birth, NHI, contact mobile phone and email details and PCBU; and

- if a border worker tests positive, contact tracers may access the contact details of other workers who may be Close Contacts.
- Ministry of Health staff will be able to see anonymised information and produce reports to assist with the COVID-19 response.

All information stored in the Register will be held securely in compliance with Ministry of Health standards for the duration of the COVID-19 pandemic response. Then it will be destroyed. When a worker leaves the role that requires them to be tested, they can request their PCBU to remove their personal information from the Register (other than their NHI, dates of attendance on site and test performed dates).

If any worker wants to know what information is held about them on the Register or to make any corrections, they can contact the Ministry of Health at: information@health.govt.nz.

Who can be contacted about privacy concerns?

If concerns about privacy associated with the Register arise the relevant PCBU can be contacted, or contact made via the Ministry of Health email address:
information@health.govt.nz.

If these options do not satisfy the privacy concerns, contact details for the Office of the Privacy Commissioner can be found on <https://privacy.org.nz/about-us/contact/>