



Public Service Commission

Te Kawa Mataaho

3 June 2026

9(2)(a) privacy

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Official Information Request

Our Ref: OIA 2026-0126

I refer to your Official Information Act 1982 (OIA) request received by the Public Service Commission Te Kawa Mataaho (the Commission) on 17 May 2026 for:

This request concerns the handling of internal or staff-raised concerns relating to COVID-19 vaccination data, post-vaccination outcomes, mortality analysis, adverse-event reporting, and any protected-disclosure or whistleblower pathway available to Health New Zealand / Te Whatu Ora staff.

For clarity, this request does not seek private health information about any identifiable individual.

Please provide the following information.

1. Protected-disclosure and whistleblower pathways

Please provide all policies, procedures, guidance documents, staff notices, intranet guidance, training material, or operational instructions in force between 2020 and 2024 concerning:

- 1. protected disclosures;*
 - 2. whistleblower disclosures;*
 - 3. public-interest disclosures;*
 - 4. staff reporting of serious wrongdoing;*
 - 5. staff reporting of serious health or safety risks;*
 - 6. staff reporting of data-integrity concerns;*
 - 7. staff reporting of concerns involving COVID-19 vaccination data, vaccine safety, adverse events, or mortality data.*
- 2. Appropriate authority / escalation process*

Please provide records identifying:

- 1. who within Health NZ / Te Whatu Ora was authorised to receive protected disclosures;*
- 2. whether staff could raise concerns externally to an independent authority;*
- 3. whether staff could raise concerns where the concern involved Health NZ itself, the Ministry of Health, Medsafe, or the COVID-19 vaccination programme;*
- 4. what steps staff were instructed to take before making an external disclosure;*

5. what protections staff were told would apply if they made a good-faith disclosure.
3. COVID vaccination data concerns

Please provide all records, whether policy, briefing, memorandum, risk assessment, internal guidance, or correspondence, showing how Health NZ / Te Whatu Ora handled staff concerns about:

1. COVID-19 vaccination data;
 2. vaccine safety data;
 3. post-vaccination deaths;
 4. adverse-event reports;
 5. mortality trends;
 6. data coding or classification issues;
 7. statistical or analytical concerns;
 8. allegations that official public statements did not match underlying data.
4. Distinction between misinformation, protected disclosure, and data breach

Please provide all records explaining how Health NZ / Te Whatu Ora distinguished between:

1. misinformation or disinformation;
2. a good-faith staff concern;
3. a protected disclosure;
4. a privacy breach;
5. unauthorised access;
6. unauthorised disclosure;
7. disclosure made for claimed public-interest reasons.

Please include any decision trees, assessment templates, staff guidance, legal advice summaries, or internal escalation frameworks.

5. Independent expert review

Please provide all records showing whether Health NZ / Te Whatu Ora, the Ministry of Health, Medsafe, or any other agency considered obtaining an independent expert review of COVID vaccination data, including review by:

1. statisticians;
2. epidemiologists;
3. pharmacovigilance experts;
4. data-integrity experts;
5. mortality-analysis experts;
6. privacy-preserving data analysts;
7. independent external reviewers.

Please include any records showing whether aggregated or anonymised data could be released publicly to allow independent testing of vaccine-safety or mortality claims without exposing private health information.

6. Referral to Police / enforcement decision

Please provide all records relating to any decision, recommendation, or assessment to refer a Health NZ / Te Whatu Ora staff member, contractor, or former staff member to Police in relation to alleged unauthorised access to or disclosure of COVID vaccination data.

This request includes:

- 1. referral memoranda;*
- 2. decision notes;*
- 3. legal advice summaries;*
- 4. privacy harm assessments;*
- 5. re-identification risk assessments;*
- 6. public-interest assessments;*
- 7. records showing whether protected-disclosure issues were considered before referral;*
- 8. records showing whether independent expert review was considered before referral;*
- 9. communications with Police, Crown Law, the Ministry of Health, Medsafe, Public Service Commission, or the Privacy Commissioner.*
- 7. Public-interest assessment*

Please provide all records showing whether Health NZ / Te Whatu Ora considered:

- 1. whether the person making or claiming to make the disclosure believed the information showed serious public risk;*
- 2. whether there was a genuine public-interest issue;*
- 3. whether the concern could have been investigated without releasing identifiable data;*
- 4. whether the agency had failed to provide a trusted internal or external reporting pathway;*
- 5. whether prosecution or Police referral could have a chilling effect on future protected disclosures by public servants.*
- 8. Document schedule*

For any withheld material, please provide a schedule identifying:

- 1. document title;*
- 2. date;*
- 3. author or originating unit;*
- 4. recipient;*
- 5. general subject matter;*
- 6. withholding ground relied upon;*
- 7. whether partial release has been considered.*

Information not held

The Public Service Commission does not hold the information requested and believe it is held by Health New Zealand – Te Whatu Ora. Ordinarily under section 14 of the Official Information Act 1982, we are required to transfer the request to the Commission. However, as they have also received your request directly and will be responding to you, in this instance, we do not see it necessary to formally transfer your request.

If you wish to discuss this decision with us, please feel free to contact Enquiries@publicservice.govt.nz.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that we intend to publish this response (with your personal details removed) on the Commission's website.

Yours sincerely



Nicky Dirks

Manager – Ministerial and Executive Services
Public Service Commission Te Kawa Mataaho