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# Introduction

*This briefing sets out the Social Investment Agency's contribution to achieving better outcomes for New Zealanders*

This briefing provides information about the role and purpose of the Social Investment Agency (SIA), and how the SIA can help the government achieve its priorities for New Zealanders.

At the heart of social investment is the provision of services that make a genuine, lasting difference to people, delivered at the right time and in the right way. This involves safe, secure and trusted use of data and evidence to improve our collective understanding of the needs of people over their lifetimes. How effective the services delivered are is consistently measured to make sure outcomes improve and future decisions are well informed.

The SIA is a catalyst for change across the social system, by demonstrating the value of using data, technology and evidence, and trialling how the sector (providers and government agencies) can work together to innovate and embed more effective ways of working. Above all, the SIA's work focuses on supporting the social sector to deliver better services by improving decision making. We start small, and plan for scale when successful. Our focus on scale also means we are keenly aware of the limitations of acting alone; we always work in partnership with Non-Government Organisations (NGOs) and government social sector agencies.

This document begins by introducing the SIA, its budget and responsibilities. It then sets out in three sections how social investment and the SIA can help the government achieve its priorities.

## The SIA:

- 1. Helps government agencies, NGOs and others to better understand what people need.**
- 2. Drives the increased use of evidence to get better outcomes.**

## **3. Helps make the system work better for people.**

Our first briefings to you (through November) will cover:

- **Data** – we will be seeking a decision about funding for the next stage of the SIA's Data Exchange. We will also be seeking a decision on public consultation on a draft Data Protection and Use Policy. Further information on both are included in this briefing.
- **Measuring Wellbeing** – we will provide information on our projects to scale and embed the measurement of well-being in the social sector. "Well-being" captures the ability of people to live the lives to which they aspire, and spans both material conditions and quality of life.
- **Social Services Commissioning** - we will provide you with a briefing on work we are doing with providers and community groups to improve critical elements of service commissioning (including innovation, design, contracting, procurement and reporting). This work responds to the findings of the NZ Productivity Commission, along with strong anecdotal evidence from NGOs, that existing models have a number of weaknesses and fail to support the best outcomes for people most in need of social services.
- **Place-Based Initiatives** – we will provide information on Place-Based Initiatives in Te Tai Tokerau, South Auckland and Tairāwhiti, including their progress, future objectives and resourcing, and the role of the SIA's National Support Team.

# The Social Investment Agency

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*The SIA was set up to support the social sector make better decisions and improve outcomes for New Zealanders*

The SIA's purpose is to support government to **invest in what works for better lives** by getting the right help to people who need it, at the time it will make the most difference.

The SIA is a new agency (established 1 July 2017), that is still embedding a work programme; the agency is using a 'test, learn, adapt' approach that means we can quickly adapt to new information and priorities.

The SIA is a Departmental Agency, hosted within the State Services Commission. Its acting Chief Executive is Dorothy Adams.

## **The agency is funded out of two appropriations in Vote State Services:**

### **Designing & Implementing Social Investment**

- Total \$9.513m<sup>1</sup>

There is also funding for Phase Two of the Data Exchange (contingent on a successful business case) of \$7.230m for 2017/18 and \$9.528m for outyears.

### **Place-based Initiatives – National Support:**

- \$1.020m Place-Based Initiatives (to 30 June 2018)

<sup>1</sup>\$0.546m of this is funding for 2017/18 only for the Data Exchange [Phase One].

# Independent capability

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*The SIA provides specialist capability to understand what works*

The SIA has specific and unique expertise. Our approach is to test new ways of working. We do this by deriving insight from data, partnering with NGOs, and building tools and documenting our approaches. Our work to derive insights starts with individuals and builds a picture of their interaction across the social system. This gives us an independent view that is not tied to the perspective of any single agency or part of the system. We are transparent so others can also learn from our successes and failures.

We look forward to discussing with you how we can use the capabilities we've built to support you to achieve your priorities. As a new, relatively small, and agile organisation we can quickly focus our efforts on new work programmes, for example, supporting the Government's approach to child poverty.

**The SIA's capabilities include:**

- **Data & Infrastructure:** Making it safe and easy to connect, move and access data.
- **Measurement & Insight:** Revealing actionable insights, while continuously improving how effectiveness and wellbeing is measured.
- **Engagement:** Mapping and sharing what we are learning to advise and help others engage, navigate and invest with confidence.
- **Commissioning:** Spearheading innovative approaches, and building the resources that support agencies to do the same.

## Our People

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The SIA has 52 full and part-time staff. Contact details for our leadership team are in Appendix One.

We are currently undertaking an organisation formation programme to develop a strategy, operating model and final organisation design for the SIA.

# 1. Understanding What People Need

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*The SIA helps government agencies, NGOs and others to better understand people's needs*

## We need greater comprehension of the complexity of people's lives to improve outcomes

We know that, for those people most in need, the challenges they face are not just about their health, for example, but also their housing and financial situation, their education and employment opportunities, and sometimes a brush they have had with the law. We also know that the needs of individuals, whānau and communities are interrelated, and that the benefits of support impact on more than those directly receiving that support. We are still exploring in the data what we can say are correlations, and what are causations of, poor outcomes.

We have learnt from the analysis we've done that improving outcomes and addressing the legacy of unmet need in New Zealand is not about 'most people'. The data shows us that need is exponentially higher for those most in need, rather than normally distributed.

Analysis of integrated data has been the initial focus of both individual agencies and the SIA because of advances made possible by Statistics New Zealand's Integrated Data Infrastructure (IDI). This research database is world leading, offering significant opportunities to advance our understanding of need, and impact over time, by linking individuals' de-identified data from a range of government and non-government sources.

## Data helps give us a richer understanding of people's lives

Making better use of data gives us a much richer understanding of people's needs - how they are or are not being supported, what's working for certain people and what's not, and the nature and quantity of resources (money, time, assets) being applied.

There is an increasing awareness of the benefit and value of moving to this way of using data and insights, however, we must continue to build trust and confidence with New Zealanders that the way we use information is safe, secure and respects their privacy.

We are continuing to develop our analytical maturity. Most analytical approaches to date have been either descriptive or based on actuarial valuations of fiscal liability and fiscal return because there is established methodology for this. Fiscal measurement alone does not capture everything that matters. Work is underway to develop methodologies that also measure well-being and value social outcomes. Building a comprehensive picture of the impact of government interventions on well-being is taking time.

## The SIA supports agencies to take action on insights

The SIA is using what it learns from its analyses to help inform how services can do more to help people in need. The following analyses (social housing and mental health) are examples that demonstrate the power of analytics to provide new insights, as well as confirm or challenge existing assumptions, so that agencies can take well informed action on complex social issues.

## Social Housing

The SIA's first analysis using the IDI was to help understand what benefits there are for those living in a social house. Data from the Ministry of Social Development (MSD), Ministry of Education and Inland Revenue was sourced from the IDI. See Appendix Two for the full disclaimer on the use of findings from IDI analysis.

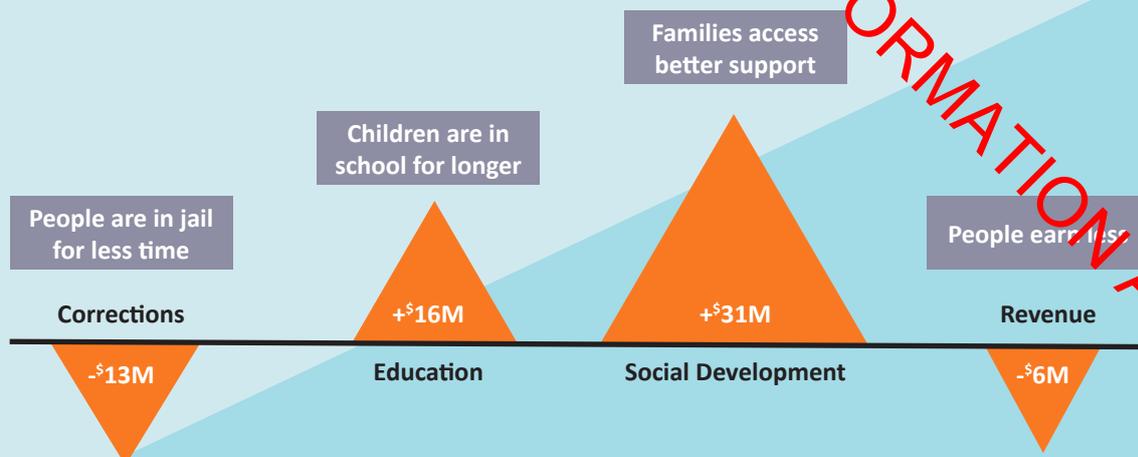
**We found that social housing helps New Zealanders to lead better lives. We learnt that, over six years, when living in a social house:**

- **People are in jail for less time than those not in social housing** (that's a 25% reduction – or \$13m – in Corrections spend). While the number of households that have interactions with Corrections is similar, those in social housing are more likely to have less serious sentences such as community service and home detention rather than prison or remand.

- **Children are in school for longer than those not in social housing** (that's a 6% increase – or \$16m – in Education spend).
- **Families access better support than those not in social housing** (that's a 4% increase – or \$31m – in welfare spend). Our analysis showed that those in social housing receive substantially more in main benefits but less in supplementary assistance (such as food grants).

It also estimated that people in social housing earn less, leading to a \$6m reduction in tax paid on income.

This work has been used by Housing New Zealand Corporation (HNZC) and MSD to better support prisoners on their release. It could be used to inform future decisions about social housing provision and how we can leverage it to ensure people access other support they need.



## The SIA is establishing principles to guide the safe, secure and trusted use of data

The SIA is leading the development of a Data Protection and Use Policy. The policy aims to give New Zealanders the confidence that personal data is only used by reference to clear guidance on when, how and why it is appropriate data, and that suitable safeguards are applied to respect and protect privacy.

The Policy will provide a set of principles, guidelines, tools and procedures that describe how data about people using social services can be collected, transferred and used safely.

New Zealanders need confidence that we have the right processes in place to ensure that we don't breach privacy or compromise safety and well-being in any way.

A working group including representatives from SIA and Statistics New Zealand, NGO advisers, iwi and Pasifika advisers, MSD, Ministry for Vulnerable Children, Oranga Tamariki, Office of the Privacy Commissioner, and client representative groups has been established (although not all representatives have been finalised).

We are about to embark on public consultation on a draft policy, and wish to discuss both the draft policy and consultation timeline with you.

## The SIA's Data Exchange allows for the safe and easy movement of data

Data about programmes, services and clients flows through the wider social sector for a range of reasons. Processes for sharing this data and connecting it with other datasets are ad-hoc, manual and not always secure. The Data Exchange addresses these issues by enabling two-way sharing of anonymised and non-anonymised data. It automates and simplifies a range of activities involved in mapping and structuring data-sharing scenarios, and allows sharing organisations to accurately record the legal basis for sharing information.

Participating NGOs and service providers connect their data to the Data Exchange, deciding what data they share, with whom and when.

The combination of the Data Protection and Use Policy and the Data Exchange providing a controlled, safe and easy mechanism for sharing when appropriate, ensures that more people will have the right information at the right time to make better decisions.

### **This means that:**

- Front-line staff can make better informed decisions with their clients because they have more information (currently held by government) about their clients.
- NGOs/service providers can monitor and fine-tune their programmes.
- Government agencies are better informed to generate policy advice.
- Ministers are provided with more accurate reports on progress towards results.

Four government agencies and six NGOs are now connected via the Data Exchange, proving that the technology and processes work so others can follow. A business case for Phase Two of this work has been completed, and you will receive more information on this in the coming weeks.

## Mental Health

SIA's second analysis was on mental health conditions and addiction. Using the IDI, we estimated the prevalence of mental health conditions and described the life pathways of people with mental health conditions, to help identify the best times for different types of support.

The analysis found that more than 15% of New Zealanders accessed mental health or addiction services or treatments in 2014. Of these, 22% were using services or treatments for the first time.

**For people who experience distress, there are significant differences in groups who access help:**

- People in Auckland were less likely to access services or treatments, compared with people in other regions.
- People over 50 were more likely to access services or treatments, compared with people under 50.
- Māori and Pasifika people were less likely to access services or treatments, compared with Europeans.
- Women were more likely to access services or treatments, compared with men.

**High distress is reported by higher proportions of:**

- Younger people, compared with older people.
- Māori and people categorised as 'other' ethnicities, compared with Europeans.
- Women, compared with men.
- Lower income earners, compared with higher income earners.

The work so far describes associations between variables, not causal effects.

We are building on this analysis by working with the Ministry of Health and the Chief Science Advisors' Network to develop a study to build the evidence base around the mental health of New Zealanders. The study is a response to limited and out of date information about who is affected by mental health disorders in New Zealand. This new study will provide a clearer picture of the nature and prevalence of mental health disorders in New Zealand to understand who is experiencing or is at risk of poor mental health. It will provide a baseline for measuring progress.

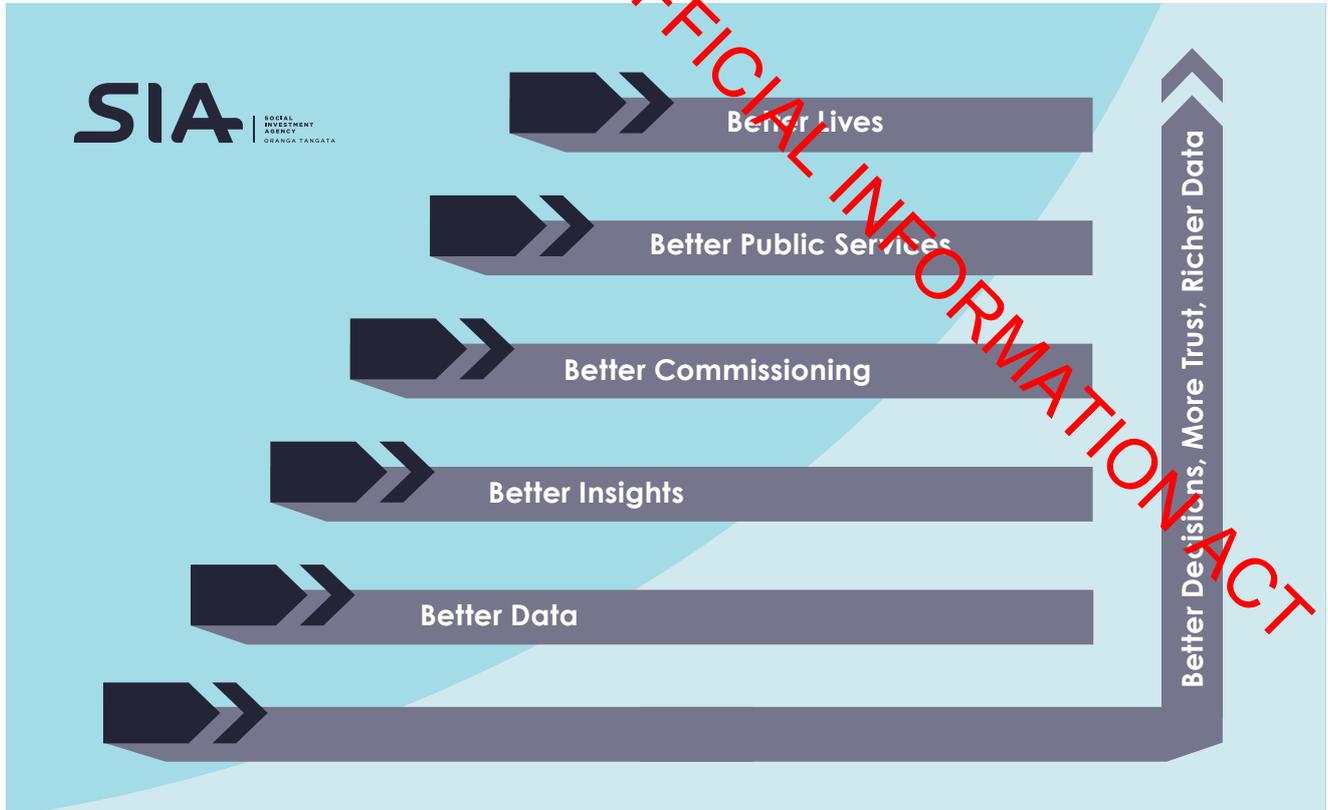
## 2. Acting on Evidence

*The SIA drives the increased use of evidence to achieve better outcomes*

### Evidence supports better decisions

While the idea of evidence-based policy has been around for a while, the planning of government programmes could be more disciplined in its use of evidence to know what works, and for whom. Without this discipline, we cannot know if we have made a difference in people's lives.

By embedding the discipline of using and gathering evidence, we will build and strengthen our evidence base so that we can make more informed decisions, as illustrated in the diagram below.



## We need a range of evidence to know what works, for whom

Evidence that supports the design and delivery of services takes many forms, including the voice of the client. No decision should be taken without knowing that evidence has been tested with individuals and whānau themselves to ensure the insight gained is accurate. Further, communities have insight and evidence that is critical in understanding people's needs and meeting those needs.

Studies that follow people's journeys through life also provide an unrivalled wealth of data for understanding what works. Growing Up in New Zealand (children born in 2009/10), the Christchurch Health and Development Study (children born during mid-1977), and the Dunedin Multidisciplinary Health and Development (children born in 1972/73) are rich sources of information.

### At Risk Mothers and their Babies

**This was an exploratory, data-driven approach to understand what characteristics put mothers and their babies at risk of poor outcomes. We did this by combining and cross-referencing multiple sources of data and analysis to produce actionable, evidence-based advice for decision makers. The analysis comprised four elements:**

- **Published research** on the key factors which influence a baby's start in life.
- A **population model** built using IDI data, which tells us who is most at-risk, what service channels we might use to access them, and what indicators or characteristics are most strongly associated with increased or decreased risk.
- **Service landscape analysis** of Lead Maternity Care and Well Child Tamariki Ora.
- **Advice** from the government Chief Science Advisors about where the greatest opportunities are to provide better support.

#### The analysis indicated that:

- 25% of mothers are at-risk of poor outcomes, and about half of their babies are also at risk.  
We currently invest too late, missing opportunities to support pregnant women and babies towards better life outcomes. Presently, most government support in the first five years is for 3-5 year olds. We recommended investing earlier, with a focus on pre-conception and pregnancy.
- The crucial factors for babies' start in life are their mother's nutrition, a healthy and low-stress uterine environment, parenting skills, and a safe, healthy physical environment after birth.
- Most at-risk women are the least likely to engage with maternity services, and we need to look for new ways to support this group.
- The drivers of risk for pregnant women are often not health-related, so we need a cross-sector approach.

## The SIA is focused on measuring what matters

We work with agencies and providers to understand and help them understand what is required to measure what works. We publish our work so that others can benefit from what we learn.

### The following work is underway to do this:

1. Service coverage reporting. This describes the extent to which individuals' needs are being met through the supply and uptake of government funded services.
2. Understanding diversity. This will identify areas of overlapping need among different groups in the population. For example, to understand how many families experience

a combination of unemployment, chronic health need and housing stress. This will help identify where agencies need to co-operate to find effective solutions for different groups in the population.

3. Measuring well-being and outcomes. We are identifying the essential domains of well-being, how to measure these domains, and the data needed to do this.
4. Social sector data map. We are developing a map of social sector data, where it's held, its completeness and quality. This will enable significant gaps in social sector data to be clearly identified, allowing the SIA and others to focus on addressing the most pressing data gaps.

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# 3. Working better for People

*The SIA helps make the system work better for people*

## The SIA is developing alternative processes and resources to empower communities and providers

The SIA is supporting communities and providers to use insight about what works in their decision making.

**We have received strong anecdotal evidence that support the findings of the NZ Productivity Commission that the existing models of social service procurement fail to align with the needs of our communities and the most vulnerable New Zealanders. Weaknesses include:**

- Policy development and the Budget cycle reinforce a siloed approach that does not address the total needs of New Zealanders, and limits the ability of providers and communities to introduce their own ideas and proposals.
- The public service is incentivised to focus on risk and cost minimisation. As a consequence, procurement processes are run at arms-length from providers and tend to favour status quo models, stifling innovation.
- Lack of flexibility, onerous and costly processes, and little quantitative impact evaluation.

**To address these weaknesses, the SIA, alongside key NGO partners (see over page) and government agencies, is building a set of processes and resources that lift the influence of NGO and community expertise in how the system works. We believe that, taken together, these elements will create a stable, end-to-end pathway for the use of insight in social services.**

**We propose that the pathway comprise:**

- An 'open front door' to government to encourage and receive proposals from organisations external to government.
- Incubation processes and resources, including offering capability for third parties to get access to government data and insight.
- New contract models and terms incorporating 'quick wins' such as extending contract terms.
- A new data and reporting model that balances the need for client data for evaluation with ethical, security and social licence issues.
- The use of digital, automated reporting mechanisms to reduce waste and system inefficiencies including the principle of 'collect once, use many times' across multiple government departments.

We anticipate that these components together will help strengthen a system in which families, communities and providers have far greater input into the design, specification and delivery of services for the greater benefit of New Zealanders.

This work will be made available on an interactive website that we are building in partnership with NGOs.

## We have partnerships with NGOs to help develop the social investment system and commissioning tools

We are entering into partnerships with a range of providers to trial and test new ways of working with families with complex needs and improve service commissioning.

### We partner with Methodist Mission Southern

This 24-month partnership between the SIA and the Methodist Mission Southern (MMS) is to learn from the experiences of 10-12 NGOs (including MMS) who will use an integrated approach to deliver a range of social services across the Otago and Southland regions.

Participating providers have shared quality assurance mechanisms (e.g. data capture, data analytics, practice support and outcomes reporting), which ultimately helps them understand the effectiveness of services.

### We partner with the Wise Group

This partnership enables the SIA and the Wise Group to co-design social investment approaches, with an initial focus on improving social housing contractual reporting and data exchange with MSD.

We are also investigating ways to transfer non-anonymised data (that ends up anonymised for analytics) about people receiving housing support into the IDI using the SIA's Data Exchange to ensure secure and ethical use of data. The partnership will improve the quality and types of data collected and shared in contract reporting, enable a robust assessment of the effectiveness of the housing initiatives and facilitate safe, quick and easy data-sharing processes.

### We partner with Presbyterian Support Services Northern

Presbyterian Support Northern (PSN) is a significant NGO in the social sector, based in Auckland but with operations from Taupo to Northland. PSN has made its own investments in social sector measurement and evaluation, and those resources will be available to SIA as part of this work.

This partnership between the SIA and PSN tests the core data standards needed for social investment, via the implementation of automated contract reporting for the Social Workers in Schools contract, and to help PSN test the effectiveness of two approaches for funding services.

We will compare the current contracting model funded through multiple government contracts for similar services in Rotorua, against a 'bundled' single contract for delivering the same services in Tauranga.

### We partner with Family Help Trust

Family Help Trust (FHT) operates child-abuse prevention services for high risk families in Christchurch. FHT work in a space called "The Loft" in Christchurch which also houses several other NGOs. Organisations working in The Loft sign up to a collaboration agreement focused on the inter-related needs of their clients. This is under-pinned by client consent agreements that allow Loft participants to share information for the benefit of clients who have come through their "front of house" channel.

We are exploring the option of using the Data Exchange to implement efficient, safe and privacy-centric data sharing between a subset of loft participants.

## We partner with Te Tihi

We partner with Te Tihi o Ruahine Whānau Ora Alliance (Te Tihi) to measure outcomes and evaluate provider impact. Te Tihi is an alliance working with a collective impact pilot, Kainga Whānau Ora Pilot. The alliance comprises iwi, local providers, and local and central government agencies. The primary purpose of the alliance is to improve whānau-centric outcomes and identify and drive system change and innovation. The three goals for the pilot are that:

- All whānau live in structurally safe, warm, dry homes within flourishing communities in Palmerston North
- These same whānau have access to workshops and educational opportunities which increases knowledge and skills to make improved decisions
- Whānau live in loving and respectful relationships free of violence.

The pilot's focus is to improve housing delivery and whānau outcomes according to the Whānau Ora outcomes framework. Te Tihi is initially working with 100 families living in HNZC Social Housing to ensure that local services are designed and delivered to the expressed aspirations of those families and to create strong change within partner organisations and agencies.

The SIA is currently drafting a collaboration agreement with Te Tihi to develop a quantified impact assessment framework for the initiative. A key feature of the partnership is that only information that families have given consent to being collected will be used for the evaluation, in addition to anonymised administrative information held in the IDI. The principle of Tino Rangatiratanga ("Respecting the authority and autonomy of families and each Partner and their right to self-determine their own vision, purpose and direction and achievement pathway") is fundamental to the design of the evaluation. We are also testing what the return path of information to families should be so they know what government has collected and for what purposes (e.g. a family dashboard). The partnership with Te Tihi will be a key test case

for the application of the Data Protection and Use Policy.

## We provide support for the Place Based Initiatives

Three Place Based Initiatives (PBIs) in Te Tai Tokerau, South Auckland and Tairāwhiti are designed to test how to improve outcomes through innovative governance at the local level. The PBIs are all based on local collective decision-making using data, evidence, monitoring and evaluation.

The SIA has provided support to each PBI through our National Support Team. The National Support Team, like the PBIs, has funding confirmed until the end of the current financial year. We will be providing advice to you shortly on the National Support Team's future role and resourcing, alongside the PBIs' report-backs to Ministers.

### Kainga Ora (Northland) - Te Tai Tokerau

Kainga Ora has scaled up the existing Northland Social Wellbeing Governance Group and is initially focusing on working with three communities: Kaikohe, Kaitiāia, and the Whangarei suburb of Otangarei. Kainga Ora is working to identify children and young people at risk of poor outcomes and ensure that each at-risk child has one assessment and one shared plan. The 'Kainga ora Table' operating model brings together agency and stakeholder experts. Local knowledge and intelligence is drawn on to consider the full range of issues facing each child and Kainga network, identify service gaps, and design and test prototype responses. Kainga Ora has also supported the creation of Project Action Groups which include non-government social service providers, community leaders, and strategic partners, to create community action plans for each area.

## The South Auckland Social Investment Board

The South Auckland Social Investment Board (SIB) is made up of 12 government agencies. The SIB's initial focus is on an estimated 1300 0-5 year olds and their families at-risk of poor social and health outcomes in Māngere. Intervention workstreams have been established to improve access to universal and tailored services, optimise internal and cross agency processes and infrastructure, and to develop five cross-agency programmes: Family Harm - Whāngaia Na Pa Harekete model, Housing Support Service, Alcohol, Drug and Mental Health, Start Well Māngere (intensive in-home visitation) and Early Childhood Education.

The SIB is tailoring evaluative approaches for its intervention areas, and undertaking local analysis to inform local social investment thinking and decision-making.

## Manaaki Tairāwhiti

The Gisborne-based PBI has focused on consolidating 12 existing governance and advisory groups across the Tairāwhiti region to create the single advisory group, Manaaki Tairāwhiti. Manaaki Tairāwhiti has an expanded mandate to drive service and practice improvements, and has worked with stakeholders to develop community action plans focused on community safety, disability, family violence prevention, social inclusion and youth.

Manaaki Tairāwhiti has developed an operating model that integrates the daily triage assessments of Police, Social Development and Health-led initiatives focused on at-risk families. It is identifying 50 families it will work with to test the integrated model, including information sharing boundaries and protocols, and social system capacity to meet their needs.

## We are building other relationships to help us innovate

Finally, alongside our strategic partnerships with NGOs and communities, we see potential in a more strategic relationship between philanthropy and government. To support this, the SIA, with Philanthropy New Zealand, co-chairs the philanthropy/government agency forum.

The SIA is also establishing relationships with a small group of international organisations that operate with principles similar to those underpinning New Zealand's social investment approach. These include the UK's Behavioural Insights Team (also known as the Nudge Unit), the UK's Government Data Science Partnership and the What Works network. We are supporting and benefiting from the EU and UK social investment collaborations, led for New Zealand by the Prime Minister's Chief Science Advisor.

# Appendix one

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## *Our Leadership Team*



**Dorothy Adams**  
Acting Chief Executive  
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**Edward (Ed) Montague**  
General Manager,  
Commissioning  
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**Danny Mollan**  
General Manager,  
Data and Infrastructure  
0



**Kirsten Stephenson**  
General Manager,  
Corporate  
0



**Doug Lambert**  
General Manager,  
Measurement and  
Insights  
0



**Emily Mason**  
General Manager,  
Engagement  
0

## *Supporting our Leadership Team*



**Alistair Mason**  
Principal Advisor



**Scott MacKenzie**  
Chief Operating Officer



**Kate Wareham**  
Director, Social  
Investment Agency  
Formation

# Appendix two

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## *IDI Disclaimer*

The results in this document are not official statistics, they have been created for research purposes from the Integrated Data Infrastructure (IDI) managed by Statistics New Zealand.

The opinions, findings, recommendations and conclusions expressed in this presentation are those of the author(s) not Statistics NZ, or other government departments.

Access to the anonymised data used in this study was provided by Statistics NZ in accordance with security and confidentiality provisions of the Statistics Act 1975. Only people authorised by the Statistics Act 1975 are allowed to see data about a particular person, household, business or organisation and the results in this excel table have been suppressed to protect these groups from identification.

Careful consideration has been given to the privacy, security and confidentiality issues associated with using administrative and survey data in the IDI. Further detail can be found in the

Privacy Impact Assessment for the Integrated Data Infrastructure available from [www.stats.govt.nz](http://www.stats.govt.nz).

The results are based in part on tax data supplied by Inland Revenue to Statistics NZ under the Tax Administration Act 1994. This tax data must be used only for statistical purposes, and no individual information may be published or disclosed in any other form, or provided to Inland Revenue for administrative or regulatory purposes.

Any person who has had access to the unit record data has certified that they have been shown, have read, and have understood section 81 of the Tax Administration Act 1994, which relates to secrecy. Any discussion of data limitations or weaknesses is in the context of using the IDI for statistical purposes, and is not related to the data's ability to support Inland Revenue's core operational requirements.