

12 September 2025

By email to: [REDACTED]

Kia ora [REDACTED]

OFFICIAL INFORMATION ACT REQUEST 2025/50

On Monday, 4 August 2025 you made a request under the Official Information Act 1982 (the OIA) for the following information:

*Under the **Official Information Act 1982**, I formally request the release of all documentation, decision-making records, data flow maps, technical infrastructure agreements, and internal communications relating to the **unauthorised deregistration, migration, or alteration of Māori voters from the electoral roll between 1 January 2024 and 1 August 2025**.*

SPECIFIC INFORMATION REQUESTED

A. System Infrastructure and Hosting

1. All contracts, agreements, or Memoranda of Understanding (MoUs) between the Electoral Commission and **Amazon Web Services (AWS)** or AWS-aligned partners regarding:
 - Hosting of electoral databases
 - Cloud infrastructure for RealMe integrations
 - Identity verification systems
 - Roll management platforms
2. Details of **cloud jurisdiction** (physical and legal) for all voter roll data hosted by or through AWS platforms — particularly:
 - The location of primary and backup servers
 - The access control layers applied
 - Whether any data is stored, processed, or accessed from **offshore locations**
3. Any **privacy impact assessments (PIAs)** or **security audits** conducted before the migration or rollout of AWS-based electoral systems.

B. Electoral Roll Alteration and Māori Voter Data

4. Internal documentation regarding:
 - Systemic “clean-ups” or roll integrity processes that led to the **removal or reassignment of Māori voters**
 - Any use of **automated classification, address matching, or RealMe-linked identity triggers** that resulted in involuntary roll shifts
 - Lists of all known **incident reports or internal alerts** relating to anomalies in roll status for Māori voters

5. *Breakdown of total Māori voters removed or transferred without explicit consent or notification during the above timeframe, by rohe and iwi affiliations (if held).*
6. *Any correspondence with **DIA (Department of Internal Affairs), Stats NZ, or AWS representatives** regarding the backend processes involved in data verification, including:*
 - *API-linked systems*
 - *AI or machine-learning logic used for roll classification*

C. External Agency Access

7. *All disclosures to, or data-sharing arrangements with, **foreign or domestic agencies**, including:*
 - *U.S. entities under the **CLOUD Act***
 - *New Zealand Police*
 - *Ministry of Justice*
 - *Department of Internal Affairs*
 - *Five Eyes-aligned intelligence partners*
 - *Any third-party contractors involved in data processing*
8. *Copies of any briefings, reports, or emails regarding the implications of the **FBI's new office in Wellington (opened 28 July 2025)** on electoral system security and access.*

D. Governance and Risk Management

9. *Meeting minutes, risk assessments, and internal memos addressing:*
 - *Known system vulnerabilities affecting Māori voters*
 - *Breach alerts, complaints, or roll challenges linked to AWS infrastructure*
 - *Internal discussions about the **Te Tiriti o Waitangi** implications of hosting Indigenous voter data on foreign-governed platforms*
10. *Documentation of **any legal advice** received regarding:*
 - *The potential for data sovereignty violations*
 - *Electoral integrity breaches connected to third-party systems*

Please find answers to your questions below.

A. System Infrastructure and Hosting

1. *All contracts, agreements, or Memoranda of Understanding (MoUs) between the Electoral Commission and Amazon Web Services (AWS) or AWS-aligned partners regarding:*
 - *Hosting of electoral databases*
 - *Cloud infrastructure for RealMe integrations*
 - *Identity verification systems*
 - *Roll management platforms*

The Commission does not utilise Amazon Web Services (AWS) for the hosting of electoral databases, identity verification systems or roll management platforms.

2. *Details of cloud jurisdiction (physical and legal) for all voter roll data hosted by or through AWS platforms — particularly:*
 - *The location of primary and backup servers*
 - *The access control layers applied*

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- *Whether any data is stored, processed, or accessed from offshore locations*

No voter roll data is hosted by or through AWS platforms.

3. Any privacy impact assessments (PIAs) or security audits conducted before the migration or rollout of AWS-based electoral systems.

There are no AWS-based electoral systems. AWS is used for the content management of the Commissions websites. The Enrol-Online system is not hosted on AWS.

B. Electoral Roll Alteration and Māori Voter Data

4. Internal documentation regarding:

- *Systemic “clean-ups” or roll integrity processes that led to the removal or reassignment of Māori voters*
- *Any use of automated classification, address matching, or RealMe-linked identity triggers that resulted in involuntary roll shifts*
- *Lists of all known incident reports or internal alerts relating to anomalies in roll status for Māori voters*

Nothing has changed in recent weeks to the enrolment processes that the Electoral Commission follows. The Commission is following the legislative processes for the Māori Electoral Option and the roll inquiry (enrolment update) campaign conducted prior to local elections.

On 1 April, we began a public information programme to encourage people to update their enrolment details ahead of the local elections and raise awareness that Māori voters could change their roll type for the local elections before 10 July.

We sent packs to 3.6 million people on the electoral roll asking them to check their details and ran a nationwide advertising campaign. We followed up with text messages and emails to people whose enrolment details were out of date.

Since 1 April, nearly 345,000 people have enrolled or updated their details, including more than 59,000 voters of Māori descent (on both the general and Māori rolls). 63.5% of these transactions have been online.

In total, as of 5 August, 3,316,761 people are enrolled on the general roll and 298,667 people on the Māori roll. There are 113,402 people on the dormant roll: 98,703 on the general roll and 14,699 on the Māori roll.

People are moved from the main roll for their electorate to the dormant roll for their electorate if we lose touch with them, for example, if we get returned mail from an old address, and go back on the main roll when they update their address with us. A person can still cast a special vote if they are on the dormant roll. Their roll – Māori or general – is not changed if they are moved onto the dormant roll. As soon as they re-enrol, they are moved from the dormant roll to the main roll. If an elector on the dormant roll does not re-enrol, then after 3 years, by law they have to be removed from the dormant roll and become ineligible to vote.

The dormant roll process is set out in the Electoral Act. It's important for the integrity of the electoral roll that people are listed at their current address. It ensures that voters are eligible to vote in the ward or electorate where they live.

The Commission is not able to write to electors to tell them they have been put on the dormant roll, as their current address is not known. However, where we have mobile numbers or email addresses, we will attempt to contact electors by text and email to encourage them to update their details prior to them being made dormant.

The following table shows the number of Gone no address notifications we have received and the number of electors that have been placed on the dormant roll in the 2025 local election campaign up to 5 August 2025 because they did not respond to follow up inquiries.

	NUMBER OF GNA	ELECTORS PLACED ON DORMANT ROLLS
2025 LOCAL ELECTIONS CAMPAIGN (TO 05/08/2025)	103,487	22,625

Anyone that has since re-enrolled, will have moved from the dormant roll to the main roll.

An elector must be removed from a dormant roll after 3 years if they have not re-enrolled during this time period. For that same time period, 24,976 were removed including 21,935 on the general roll and 3,041 on the Māori roll. Anyone that is eligible and has since re-enrolled, will have been added back onto the main roll for their electorate.

The following systems are used to manage online enrolments:

System Name	Purpose
MIKE	Enrolment record management system
Enrol Online (EOL)	Public enrolment and eligibility system
Vote.NZ Website	Website content hosting

The Commission has not experienced a system error or data loss from MIKE, Enrol Online or the vote.nz website. During peak periods this year, we have had some delays processing our enquiries. We have been reviewing our enquiries system and going through all of the enquiries checking that people's requested changes have been made ahead of the Tāmaki Makaurau by-election and the local elections.

Electors can look up their enrolment details on [vote.nz](https://www.vote.nz). We have had reports that people are not able to find themselves. It's good that people are checking their enrolment details, and we understand the frustration when people can't find their record online. We have heard the feedback and will look at how we can improve the experience for people. We identified and resolved a minor

technical issue with the message people were seeing if they left their web page open for over 30 minutes that affected less than 2% of searches. The reports on this are still being finalised.

There are a number of reasons why someone who believes they are enrolled might not find themselves using the online look-up service. They could:

- in fact not be enrolled
- be on the dormant roll
- be on the unpublished roll
- have submitted an enrolment application that is still being processed.

Even if a person is correctly enrolled, they may not find themselves if they:

- make errors when manually typing their address, rather than using the address finder
- enter an address that is different to the address in their enrolment record
- enter a first name, surname or date of birth that does not match their enrolment details
- use an auto-complete function on the web browser on their device and it enters incorrect or out of date information, or enters address information into the wrong fields.

To maintain voter privacy, the search must match the information contained in an elector's record. It is designed to ensure that an elector can only see the record we hold for them. Small variations from the details we have on file can mean that people can't find their records. There are also limits on the number of searches and the duration of searches that a person can undertake.

Anyone that is concerned about their enrolment or is experiencing problems finding their enrolment record on vote.nz can contact the Electoral Commission so we can help them. They can call freephone 0800 36 76 56 or send an email to enquiries@elections.govt.nz

There is no use of automated classification, address matching, or RealMe-linked identity triggers that result in involuntary roll shifts.

There are no incident reports or internal alerts relating to anomalies in roll status for Māori voters. On the choice between the Māori and general rolls - if you're Māori, you choose the Māori roll or the general roll when you first enrol to vote. After that, you can change rolls at any time except in the three months before a general election or the triennial local elections, or before a parliamentary by-election. Roll choice – Māori roll or general roll – is up to each person. We won't put voters on either roll by default and we won't change a person's roll without their permission (either online using verified ID or by providing a signed enrolment form).

After an elector makes a roll change, we send out a letter of confirmation so people can check their details and contact us if anything needs to be corrected.

A copy of the Commission's internal documentation for the enrolment update campaign and the dormant roll process is attached.

5. *Breakdown of total Māori voters removed or transferred without explicit consent or notification during the above timeframe, by rohe and iwi affiliations (if held).*

We do not have a breakdown by rohe and iwi affiliation, but we do have information by Māori electorate. These are records of electors placed on the dormant roll and removed after 3 years if they do not update. We do not transfer electors from the Māori to the general roll or vice versa.

Since the last election in October 2023 through to 01 August 2025, the total number of people that have been moved from the main to dormant rolls is 53,180, and of these, 46,586 are on the General roll and 6,594 are on the Māori roll. The Māori electorate breakdown is:

Hauraki-Waikato	931
Ikaroa-Rāwhiti	740
Tāmaki Makaurau	1,150
Te Tai Hauāuru	809
Te Tai Tokerau	1,082
Te Tai Tonga	1,099
Waiariki	783

Anyone that has since re-enrolled, will have moved from the dormant roll to the main roll.

An elector must be removed from a dormant roll after 3 years if they have not re-enrolled during this time period. For that same time period, 24,976 were removed including 21,935 on the general roll and 3,041 on the Māori roll. The Māori electorate breakdown is listed below:

Hauraki-Waikato	453
Ikaroa-Rāwhiti	364
Tāmaki Makaurau	552
Te Tai Hauāuru	420
Te Tai Tokerau	498
Te Tai Tonga	370
Waiariki	384

Anyone that is eligible and has since re-enrolled, will have been added back onto the main roll.

6. *Any correspondence with DIA (Department of Internal Affairs), Stats NZ, or AWS representatives regarding the backend processes involved in data verification, including:*

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- *API-linked systems*
- *AI or machine-learning logic used for roll classification*

Sections 92, 93 and 94 of the Electoral Act allow collection of information from Births, Deaths and Marriages to ensure the accuracy of the rolls. A copy of the MOU with the Department of Internal Affairs (DIA) for that is attached. Some contact details, such as phone numbers, some email addresses, and names, have been withheld under section 9(2)(a) of the OIA which relates to the privacy of natural persons. In each case where redactions have been made under section 9(2)(a), consideration has been given to, and I am satisfied that the reasons for withholding of the information are not outweighed by other considerations which render it desirable in the public interest to make that information available.

The Commission is also authorised under section 263B of the Act to information match with DIA citizenship and passport applications to invite people to enrol under the Electoral Act, however these programme have not been undertaken in the last 5 years.

The Commission uses the passport verification service if people use their passport to confirm their identity if they use the online enrolment service. A copy of the agreement with DIA on this is attached. Some contact details, such as phone numbers, some email addresses, and names, have been withheld under section 9(2)(a) of the OIA which relates to the privacy of natural persons. Some information has also been withheld under section 9(2)(b)(ii) of the OIA where the withholding of the information is necessary to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information. In each case where redactions have been made under section 9(2)(a) and 9(2)(b)(ii) of the OIA, consideration has been given to, and I am satisfied that the reasons for withholding of the information are not outweighed by other considerations which render it desirable in the public interest to make that information available.

There is no data sharing with StatsNZ or AWS regarding back-end data verification for enrolment.

C. External Agency Access

7. *All disclosures to, or data-sharing arrangements with, foreign or domestic agencies, including:*
 - *U.S. entities under the CLOUD Act*
 - *New Zealand Police*
 - *Ministry of Justice*
 - *Department of Internal Affairs*
 - *Five Eyes-aligned intelligence partners*
 - *Any third-party contractors involved in data processing*

Information about access to electoral roll data is available in the privacy and security statement available [here](#).

The Electoral Commission is required to provide electronic lists of electors to the Ministry of Justice to produce jury lists under the Juries Act 1981 and the Jury Rules 1990. The MOU with the Ministry of Justice is attached. Some contact details, such as phone numbers, some email addresses, and names, have been withheld under section 9(2)(a) of the OIA which relates to the privacy of natural persons. In each case where redactions have been made under section 9(2)(a) of the OIA, consideration has been

given to, and I am satisfied that the reasons for withholding of the information are not outweighed by other considerations which render it desirable in the public interest to make that information available.

The Electoral Commission is authorised under section 263A the Electoral Act to information match with Immigration New Zealand for the purpose of determining whether someone is ineligible for enrolment, due to their immigration status. A copy of the Electoral Commission's recent annual report to the Privacy Commissioner on this process and a copy of the MOU with Ministry of Business, Innovation and Employment are attached. Some contact details, such as phone numbers, some email addresses, and names, have been withheld under section 9(2)(a) of the OIA which relates to the privacy of natural persons. In each case where redactions have been made under section 9(2)(a) of the OIA, consideration has been given to, and I am satisfied that the reasons for withholding of the information are not outweighed by other considerations which render it desirable in the public interest to make that information available.

While we have third party contractors, no third parties process or make changes to enrolment data. The Commission does not have data-sharing arrangements with any third party contractors to use enrolment data for their own purposes.

The Commission does not have data-sharing arrangements under the CLOUD ACT, with New Zealand Police, or Five Eyes aligned intelligence partners.

8. *Copies of any briefings, reports, or emails regarding the implications of the FBI's new office in Wellington (opened 28 July 2025) on electoral system security and access.*

The Commission does not have any briefings, reports, or emails regarding the implications of the FBI's new office in Wellington on electoral system security and access. As this information does not exist, we refuse this aspect of your request pursuant to section 18(e) of the Official Information Act.

D. Governance and Risk Management

9. *Meeting minutes, risk assessments, and internal memos addressing:*
- *Known system vulnerabilities affecting Māori voters*
 - *Breach alerts, complaints, or roll challenges linked to AWS infrastructure*
 - *Internal discussions about the Te Tiriti o Waitangi implications of hosting Indigenous voter data on foreign-governed platforms*

See response to question 1 above. The Commission has not experienced a system error or data loss from MIKE, Enrol Online or the vote.nz website.

The Commission does not utilise Amazon Web Services (AWS) for the hosting of electoral databases, identity verification systems or roll management platforms.

The Electoral Commission does not host personally identifiable voter data on foreign-governed platforms.

10. *Documentation of any legal advice received regarding:*
- *The potential for data sovereignty violations*

- *Electoral integrity breaches connected to third-party systems*

The Commission does not have any legal advice regarding data sovereignty violations, or electoral integrity breaches connected to third-party systems. As this information does not exist, we refuse this aspect of your request pursuant to section 18(e) of the Official Information Act.

In the interests of transparency, we release responses to Official Information Act requests every 3 months. We will publish this response with your personal details redacted.

You have the right under section 28(3) of the Act to make a complaint to the Ombudsman if you are not satisfied with the response to your request. Information about how to do this is available at www.ombudsman.parliament.nz or by phoning 0800 802 602.

Yours sincerely



Karl Le Quesne
Chief Electoral Officer