



**PSA Submission on  
Towards a Digital Strategy  
for Aotearoa Discussion Document  
to the Department of Internal Affairs**

**November 2021**

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## About the PSA

The New Zealand Public Service Association Te Pūkenga Here Tikanga Mahi (the PSA) is the largest trade union in New Zealand with over 80,000 members. We are a democratic and bicultural organisation representing people working in the Public Service including for departments, Crown agents and other crown entities, and state-owned enterprises; local authorities; tertiary education institutions; and non-governmental organisations working in the health, social services and community sectors.

People join the PSA to negotiate their terms of employment collectively, to have a voice within their workplace and to have an independent public voice on the quality of public and community services and how they're delivered.

We are committed to advancing the Tiriti o Waitangi of partnership, protection and participation through our work. Te Rūnanga o Ngā Toa Āwhina is the Māori arm of the PSA membership. The PSA is affiliated to Te Kauae Kaimahi the New Zealand Council of Trade Unions, Public Services International and UniGlobal.

## Overall comments

As a set of guiding goals, **the draft digital strategy appears to encompass much of what is needed to ensure a good digital future for Aotearoa New Zealand.**

**The PSA is particularly pleased to see the focus on engagement with Māori** in developing an equitable digital environment that reflects both Te Ao Māori and Te Tiriti o Waitangi.

The three overarching elements that combined provide a vision for this strategy appear to include fundamental aspects that PSA supports, **including access for all**.

Notwithstanding, this is a complex area to navigate with vast potential to benefit communities while, at the same time, presenting real **risks in terms of privacy, identity, safety, digital rights and equity**.

This submission focuses on the three elements of the vision of the draft strategy: Mahi Tika: Trust; Mahi Tahī: Inclusion; and Mahi Take: Growth, and their associated goals.

The submission seeks to identify areas where further consideration should be given in the final drafting of a digital strategy for our Aotearoa, from a community and public services perspective.

**MAHI TIKA: TRUST** We have the right foundations to sell our products and services to the world with confidence, while all New Zealanders embrace the digital future because they feel safe and secure

### Digital safety online

As outlined clearly in the discussion document, ensuring the creation of safe spaces in the digital world as well as upskilling people around cyber safety are essential for digital environment to be based on trust.

The digital age has meant more online accessibility to public officials and government social media accounts<sup>1</sup>. While New Zealand has legislation seeking to provide protections from online abuse, such as the Harmful Digital Communications Act 2015, people working in public and community services will often be subjected to inappropriate behavior from the public and this can often be seen as part and parcel of being a public servant. In light of this, **it is vital that policies and practices in the public service ensure as safe a workplace as possible for employees that provide services digitally in the future**.

### Māori data governance

**The PSA strongly supports work towards Māori data governance** and it is pleasing to see this feature in the discussion document. Given the role data plays in the development (or not) of policies and initiatives, it is fundamental that strong ethical data collection, measurement and analysis processes, as well as indigenous data sovereignty principles be used.<sup>2</sup>

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<sup>1</sup> Speir, N. (2018) *The new workplace hazard for Council officers – online attacks*. <https://ricespeir.co.nz/online-attacks/>

<sup>2</sup> Te Mana Raraunga. (2018). *Principles of Māori Data Sovereignty*. <https://cdn.auckland.ac.nz/assets/psych/about/our-research/documents/TMR%2BM%C4%81ori%2BData%2BSovereignty%2BPrinciples%2BOct%2B2018.pdf>

## Artificial Intelligence

The use of artificial intelligence (AI), as identified in the discussion document, needs to be closely monitored given the potential bias and discrimination it can have in its application.

**As the public service looks to create a more diverse and inclusive workforce to better meet the needs of the evolving communities it serves, AI applications can inadvertently put progress here at risk.**

Increasingly, organisations are using AI for targeted advertising of jobs and recruitment processes. Without appropriate checks and balances, these systems can exclude the very groups that the public service is seeking to include as **algorithms can replicate institutional and historical biases, and amplify disadvantages.**<sup>3</sup> Already, psychometric testing which the PSA does not support due to the potential it has to introduce bias and discrimination into recruitment processes is used in New Zealand. The PSA and Te Kawa Mataaho jointly developed guidance<sup>4</sup> if psychometric testing is used which adheres to Te Tiriti o Waitangi, the Gender Pay Principles, the Human Rights Act and the Privacy Act. Our expectation is that AI will be closely monitored to ensure recruitment processes are free from bias and discrimination.

## Digital government for a digital society

Our members and the communities they work with have become increasingly focused on sustainability and as an organisation, the PSA is becoming increasingly focused on climate change and decarbonisation. Our strategic goals weave elements relating to the environment, climate change, kaitiakitanga, and just transitions throughout.

The New Zealand government procurement guidance outlines elements of sustainability that should be considered when agencies are planning procurement such as **taking account of suppliers' socially responsible practices including compliance with legislative obligations to employees, and value for money over the whole-of-life**, rather than just the initial cost.

The PSA acknowledges the efficiency digital services can bring, however, **sustainability impacts should be at the forefront for procurement practices in the digital space also.** This is not explicit in the discussion document but we see this as a central component to growth of digital services where our members work and across the New Zealand economy. We would like to see that **digital technology efficiencies are not prioritised over environmental sustainability** and explicit consideration of this in a digital strategy would be useful.

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<sup>3</sup> Bogen, M. (2019). *All the Ways Hiring Algorithms Can Introduce Bias*. <https://hbr.org/2019/05/all-the-ways-hiring-algorithms-can-introduce-bias>

<sup>4</sup> Te Kawa Mataaho & The New Zealand Public Service Association. (2020). *Psychometric Assessment – Legal Considerations and Principles*. <https://www.psa.org.nz/assets/Uploads/Psychometric-Assessment-Guidance-FAQ-SSC-PSA.pdf>

There are considerable equity issues due to access to the internet and devices. This was highlighted during the lockdown for school children not having equal access to use the internet for study. Therefore, **free internet and access to devices is important if all people are to equally access public services online.**

**MAHI TAHI: INCLUSION** All New Zealanders have the tools, services and the skills they need to participate in, contribute to, benefit from, and lead in the digital world

Everyone should be able to access the benefits of digital technology

The PSA does not only believe everyone **should** be able to access the benefits of digital technology, but in fact that everyone **must** be able to access the benefits of digital technology.

As identified in the discussion document, there are barriers to this becoming a reality in Aotearoa. The 2018 census found over 340 000 households did not have internet access, that is, 11% of all households or 885,081 people (based on average household size of 2.6 people).

At a time when access to information is a necessity for work opportunities, social connection and so much more, we believe that inability to access the internet at a minimum creates an unacceptable inequity.

The PSA promotes the Aotearoa Wellbeing Commitment<sup>5</sup> as a way of making sure all New Zealanders are cared for, regardless of how much money is in their pockets. It is a commitment to **ensure all key public services are universally delivered, so everyone gets the chance to do well socially, mentally, and physically – this includes access to the internet.** There are three **first steps** that could be taken to realise this:

- **free public access:** free public access in all central and local government buildings;
- **provision of a universal package:** work with telco providers to provide a universal package funded by the Government for all other users to sign-up to if they wish to be; and
- **connectivity in public and social housing:** start by providing connectivity (free wifi) as standard in public and social housing, and for those accessing disability services and services for those over the age of 65.

The discussion document focuses primarily on the future digital world, digital government and digital citizens but does not adequately acknowledge the digital divide that exists currently. For example,

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<sup>5</sup> Aotearoa Wellbeing Commitment (n.d). <https://www.psa.org.nz/quick-menu/working-life/psa-working-life-journal/aotearoa-wellbeing-commitment-key-first-steps/>

at the height of the first lock down, it became glaringly apparent that many households did not have access to sufficient digital devices. This led to the acceleration of the Equitable Digital Access programme which provided mostly schools, rather than children, with the devices needed. Programmes such as these need to go further and ensure people, particularly of lower socio-economic families, have access to the devices they need to enable them to fully participate in the digital world of the future. **We consider that an urgent study on device usage versus household occupancy is needed.**

Although access is essential, **digital inclusion is more than just having access.** It is access **and** being able to effectively use digital technology to achieve social and economic outcomes. **A digital strategy for New Zealand should include development of strong, fit for purpose services to support people to effectively use digital technologies.**

### Digital exclusion

There appears to be little reference in the discussion document to the disabled community and technology. In fact, the document states that '*some disabled people may prefer face-to-face interaction*' (p. 16) rather than using digital solutions. While this may be the case sometimes, digital solutions should be designed with the diversity of users in mind. **One way to ensure digital solutions are more accessible is to have people with disabilities designing the technologies** where these are being developed domestically,<sup>6</sup> or where procured internationally, that have been **co-designed with relevant disabled communities.**

Another segment of the population that is often digitally excluded and to which there is little reference in the document are our senior citizens.

One third of New Zealand's workforce is aged 65+,<sup>7</sup> so the conversation around digital inclusion should not necessarily focus solely on retired seniors. A recent qualitative study conducted in New Zealand on digital inclusion and exclusion of seniors<sup>8</sup> found that younger seniors had better digital skills attributed to experiences in their working lives, but **the fast pace of changing technology may be difficult for older workers and they should be supported to continue to upskill while in work.**

The same study also found that volunteer work could enable seniors to keep up to date with

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<sup>6</sup> Shinohara, K & Tigwell, G. (2021). *Why getting more people with disabilities developing technology is good for everyone.* <https://theconversation.com/why-getting-more-people-with-disabilities-developing-technology-is-good-for-everyone-159619>

<sup>7</sup> Te Ara Ahunga Ora The Retirement Commission. *More people are working longer, while navigating a changing landscape impacted by technology and the gig economy of casual, short term jobs and self-employment.* Retrieved 03 November 2021: <https://retirement.govt.nz/policy-and-research/2019-review-of-retirement-income-policies/work-and-the-workforce/>

<sup>8</sup> Lips, M. et al. (2020). *Understanding, explaining and self-evaluating digital inclusion and exclusion among senior citizens.* [https://www.wgtn.ac.nz/\\_data/assets/pdf\\_file/0007/1902247/2020-Digital-inclusion-among-senior-citizens.pdf](https://www.wgtn.ac.nz/_data/assets/pdf_file/0007/1902247/2020-Digital-inclusion-among-senior-citizens.pdf)

applications, internet use and risks of the digital world, beyond working life; this could be further explored and supported as a complement to formal training programmes made available to seniors.

### Improve how the government delivers services digitally

#### Suitability of digital service

While it is acknowledged that there are many benefits to online access to public and community services, this may not always be appropriate, feasible or preferred by the public at large. For instance, the building of relationships and the importance of face-to-face interactions in Te Ao Māori, and likely in other cultures, may mean **some services are best provided with human interactions**, or at the very least, that this modality be an option for those who want it. Similarly, people with language barriers may find online interactions in their second language more difficult and may prefer to access services in person.

A digital strategy needs to consider what tasks are fit for digital interactions and what are not. The use of digital access for simple straight forward tasks can be used in conjunction with face-to-face interactions to free up time for conversations and relationship building can occur. **Service delivery needs to match the profile of the person accessing the services.**

Recognising that not all people have the ability to download large documents and need physical versions is also important. A lot of people who do have internet access just have it through their phone which makes it difficult to access large documents or lengthy forms. As occurs from time to time, disruptions to internet service mean that having physical default access is always needed.

#### Worker participation in digital service design

In line with our strategic goal to be He kaha, he whaimana, he uniana mō te ao hurihuri –A strong, modern & influential union, the PSA believes that **our members working in community and public services, including local government and District Health Boards, are well placed to guide the development, trialling and implementation of new services, digital or otherwise.** We have seen recent initiatives in organisations such as ACC where changes to service delivery have not provided the best outcome for staff or the public.<sup>9</sup>

**Strong worker voice** provides many benefits to the quality of the services and staff engagement and satisfaction. We urge the joint agency team that will subsequently develop the Digital Strategy for Aotearoa to ensure the voice of workers and their representatives is included. **It would be our recommendation that the joint agency group include union representatives.**

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<sup>9</sup> Bradley, A. (2021). *Overwhelmed ACC staff 'dropping like flies' after changes.*  
<https://www.rnz.co.nz/news/national/448784/overwhelmed-acc-staff-dropping-like-flies-after-changes>

## Unified systems

One of the five key areas of the Public Service Act 2020 is to create a unified public service. If the public services at large had **a more unified approach to the platforms, software and systems they used, people moving between public sector organisations could have enhanced redeployment opportunities across the sector** as they would already have some underpinning skills.

This may also assist end users with greater consistency in the platforms and systems they engage with.

**MAHI AKE: GROWTH** Our tech sector continues to be fast growing and becomes more inclusive, selling home-grown IP the world over, and all our businesses are quickly adopting technology in order to grow

## Digitally enabled businesses

The PSA acknowledges the potential benefits of having both digitally enabled people and businesses. However, as with all major changes, there are aspects we believe require particular attention. These include:

- **Just Transitions and lifelong learning**

As technology develops and more jobs become automated, workers will need to transition into different types of work and will require support to upskill. It is pleasing to see this acknowledged in the discussion document but it is our experience that training and upskilling are often put on a back burner in the public service largely as a result of high workloads and tight budgets.

**Organisations should be expected to engage workers in workforce planning to ensure transitions are just, include opportunities for ongoing training and retraining and maximize redeployment opportunities.**

- **Building a strong talent pipeline**

The PSA supports the highlighting of ‘accessible career pathways for all New Zealanders, including Māori and Pacific peoples’ (p. 22), **the digital strategy should also include an intention to support career pathways for women in technology**, particularly given the earning potential for many roles in this sector.<sup>10</sup> In fact, the more diversity there is in this sector, the richer the digital world is likely to look in the future.

The discussion document also signals that although there is a priority to grow talent domestically, there will likely be a desire to use immigration as a source of specialised expertise. We agree that talent should be supported and grown internally; however, we acknowledge that the skilled

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<sup>10</sup> TechWomen. (n.d). *Learn about gender inequality in the tech sector and what you can do to help.*  
<https://techwomen.nz/get-informed/>



migrant workforce also adds value in Aotearoa. **Monitoring is needed to ensure that exploitation of workers on temporary visas is prevented and that migrants recruited into these industries have realistic pathways to residency.**<sup>11</sup>

- **Surveillance and the right to disconnect**

The increasing use of technology in the workplace can have unintended consequences for workers in relation to their privacy and use of technology to monitor work and productivity. This can create heightened anxiety for workers as the digital world develops.<sup>12</sup> **It is important for workers to be involved in decisions about technology used in their workplaces and have confidence in the purpose for its use.** Management decisions and engagement with workers in this space should allow for any uncertainties to be addressed and for maximum benefit from the applications and technologies to be attained.

In addition, the line between physical spaces traditionally held by the workplace become more blurred in a digital environment. A particular challenge with this is the perceived, and sometimes real, **expectation of continuous availability and making it difficult for workers to disconnect.**

Our members work in roles that have direct impact on the public and are often public-facing. We know our members view their mahi as fundamental in providing services for Aotearoa and are, therefore, often driven by the spirit of service to their communities. The 24/7 access to systems, coupled with this desire to serve, could potentially make it harder for our members to be able to disconnect. **It is our view that strong promotion of workers' right to disconnect from work is needed in all businesses and organisations.**

- **Meaningful funding of investment in public services which often fall behind**

All growth has implications for funding. The desire to see more digital government will need to be appropriately resourced so that community and public services are able to keep a pace.<sup>13</sup>

There is a current issue of publicly funded but community delivered services through NGOs, for example, that do not have sufficient funding to invest in upgrading their digital services, including staffing roster systems.

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<sup>11</sup> NZCTU. (2019). *Submission of the New Zealand Council of Trade Unions Te Kauae Kaimahi to the Ministry of Business, Innovation and Employment on the Temporary Migrant Worker Exploitation Review*. <https://union.org.nz/wp-content/uploads/2019/12/MBIE-Temporary-Migrant-Worker-Exploitation-Review.pdf>

See also: Martin Jenkins. (2019). *Independent review of Chorus' next generation network connection contracting model*. <https://www.martinjenkins.co.nz/assets/Uploads/Client/Final.Independent.Review.of.Chorus.Contracting.Model-April.2019.pdf>

<sup>12</sup> Riso, Sara. (2021). *Digitisation in the workplace*.

[https://www.eurofound.europa.eu/sites/default/files/ef\\_publication/field\\_ef\\_document/ef21001en.pdf](https://www.eurofound.europa.eu/sites/default/files/ef_publication/field_ef_document/ef21001en.pdf)

<sup>13</sup> Graham, J. (2021). *Cloud computing grows but agencies lacking resources, auditor general hears*.

[https://www.themandarin.com.au/173941-cloud-computing-grows-but-agencies-lacking-resources-auditor-general-hears/?utm\\_campaign=TheJuice&utm\\_medium=email&utm\\_source=newsletter](https://www.themandarin.com.au/173941-cloud-computing-grows-but-agencies-lacking-resources-auditor-general-hears/?utm_campaign=TheJuice&utm_medium=email&utm_source=newsletter)

One of PSA's strategic goals is to advocate for strong public and community services; **funding of organisations that provide these services needs to enable quality services to be delivered and sustain good pay and conditions for the workers that delivery them.**

- **Opportunities for green technologies**

The PSA's recently refreshed strategic goals emphasise our members' desire that combating climate change be at the fore of all the union's work. The discussion document does not appear to consider the ways in which technology might be developed or utilised to assist in tackling environmental issues for our future. For example, how might our domestic talent and international relationships be used to find green solutions in areas such as energy and emissions? It would be good to see the use of digital technologies to find greener solutions for our climate crisis embedded in any digital strategy for Aotearoa New Zealand.

**For further information about this submission, please contact:**

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