25OIA1650

Inland Revenue
Te Tari Taake

4 December 2024

Dear

Thank you for your email, received via our Complaints Management Team on 6 November 2024. You requested the following (numbered for ease of response):

> *In order to determine whether I will make a complaint to the Privacy Commissioner, can you please provide the following information:*
>
> 1. *The job titles (and number) of staff who were allowed to access to my personal information for non-tax purposes*
> 2. *The internal policy or procedure that allowed them to access my data for non-tax purposes*
> 3. *The policy and procedures that IRD followed to use that information for targeted advertising.*
> 4. *The Meta office (country) the data was sent to*
> 5. *The date and time that data was sent, and the date and time the request was made to Meta to delete the file.*
> 6. *A copy of the email confirming that the data file was deleted.*
> 7. *Can you also provide information on IRD's internal response to the privacy breach, including the number of staff who were disciplined in relation to the breach and the nature of the action taken against them, and any changes to policies or procedures in relation to staff access to information for non-tax purposes, and the sharing of that information to any third party not covered by New Zealand legislation.*
>
> *For the avoidance of doubt, please treat this as a request under the Official Information Act.*

Parts 1 and 2 of your request have been considered under the Privacy Act 2020 and referred to our Customer and Compliance Services team for response. You may have already received a response from them or can expect to receive this by 4 December 2024.

Parts 3 – 7 of your request have been considered under the Official Information Act 1982 (OIA) and referred to me to respond to.

Inland Revenue
Te Tari Taake

Part 3: Policies and procedures Inland Revenue followed to use information for targeted advertising

Inland Revenue used custom audience lists as one way to provide important updates, information and reminders to help you get your taxes and entitlements right. We no longer use custom audience lists with social media companies.

The Privacy Act 2020 allows personal information to be used for more than one purpose. It doesn't require you to give permission every time your personal information is used or disclosed. The Act is purpose-focused not consent-focused. This means if an organisation obtains your information for one purpose, it can use it for another purpose in some circumstances.

The Tax Administration Act 1994 permits Inland Revenue to collect and use taxpayer information to carry out or support a lawful function to administer the tax system. Using social media to display tax-related messages to taxpayers (including to persons who are in debt, have due dates for payment, or telling them about entitlements) is such a function.

Where an Act of Parliament authorises an action (for example, imposing a tax, or paying an entitlement) no contract or other agreement with any affected persons is required. That is the situation here, due to the laws described above.

I have identified 4 documents in scope of your request for internal policies and procedures Inland Revenue uses for targeted advertising. I have decided to release these to you in part, enclosed as **Appendix A.** Where information is withheld, the following sections of the OIA apply:

- 9(2)(a), to protect the privacy of natural persons,

- 9(2)(g)(i), to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to Ministers of the Crown or members of an organisation or officers and employees of any public service agency or organisation in the course of their duty,

- 9(2)(i), to enable a Minister of the Crown or any public service agency or organisation holding the information to carry out, without prejudice or disadvantage, commercial activities, and

- 18(c)(i), where making the requested information available would be contrary to the provisions of a specified enactment, namely Inland Revenue's confidentiality obligations in section 18(1) of the Tax Administration Act 1994 (TAA). Further, section 18(3) (in conjunction with section 143C(1)(a) of the TAA) prevents the Commissioner of Inland Revenue from disclosing any item of revenue information if the release of the information would adversely affect the integrity of the tax system or prejudice the maintenance of the law.

Appendix A: Internal policies used for targeted advertising

Item	Document	Decision
1.	Social media guidelines for IR staff 2024	Released in part with some redactions under sections 9(2)(a), 9(2)(g)(i), and 18(c)(i) of the OIA, contrary to section 18(3) of the TAA.
2	Marketing Campaign Guide 2024	Released in part with some redactions under sections 9(2)(a) 9(2)(i), and 18(c)(i) of the OIA, contrary to section 18(3) of the TAA.
3	Loading custom audience lists in Meta Business Manager	Released in part with some redactions under section 18(c)(i) of the OIA, contrary to section 18(1) of the TAA.
4.	Excerpt from: Data Meshing Specifications in the IR generated ASO	Released in full.

The enclosed documents contain information that is outside the scope of your request. This information has not been considered for release and has been withheld as 'not in scope'.

Additionally, social media platforms are legally obliged to comply with the policies and terms and conditions under which they provide paid services to Inland Revenue. Before using social media, we reviewed these policies and terms and conditions. If you are interested, the links are provided below:

- Facebook Terms of Service
- Instagram Terms of Use
- Facebook Customer List Custom Audiences Terms
- Facebook Data Processing Terms
- Google Terms of Service – Privacy & Terms – Google
- Google Ad Manager
- Google Platform Services Terms and Conditions
- Google Ads Data Processing Terms
- Matched Audiences - Custom Targeting for LinkedIn Ads
- LinkedIn Data Processing Agreement

As it may be of interest to you, Inland Revenue also has information sharing agreements with various agencies. These can be found on our website, as well as our published summaries of Memoranda of Understanding about information sharing that Inland Revenue conducts with various other government agencies. The links are as follows:

- [Approved information sharing agreements (ird.govt.nz)](ird.govt.nz)
- [Memoranda of Understanding summaries (ird.govt.nz)](ird.govt.nz)

Part 4: The Meta office (country) the data was sent to

Inland Revenue does not hold this information. Therefore, I am refusing this part of your request under section 18(g) of the OIA, as the information is not held by Inland Revenue, and I have no grounds for believing it is held by another agency.

Part 5 and 6: The date and time that data was sent, the date and time the request was made to Meta to delete the file and a copy of the email confirming that the data file was deleted.

On 8 February 2024 at 14:48:00, as part of the file being shared with Meta Support, we instructed Meta to dispose of it once their investigation into the troubleshooting issue was complete. When we discovered the disclosure was not part of the approved approach for custom audience lists, we followed up with Meta Support on 30 September 2024 at 16:14:21 to confirm that the file was deleted when the case was closed. Meta confirmed that when the case was closed, it no longer had access to the file. It guaranteed the data would be automatically deleted within 48 hours. They confirmed this on 18 October 2024.

We don't believe there's any risk of identity theft as Meta hasn't used the information and the file has been deleted.

I have decided to release contents of the email from Meta Support confirming the data file was deleted once the case was closed, enclosed as **Appendix B**. Some information has been withheld under section 9(2)(a) of the OIA, to protect the privacy of natural persons.

As required by section 9(1) of the OIA, I have considered whether the grounds for withholding the information requested is outweighed by the public interest. In this instance, I do not consider that to be the case.

Part 7: Internal response to the privacy breach

We have done an internal review into the circumstances surrounding the unintended disclosures including whether this was a Code of Conduct matter. Any actions taken as a result, including any employment related outcomes, are confidential. I am refusing this part of your request under section 9(2)(a), to protect the privacy of natural persons. We have taken steps to make certain that such disclosures will not happen again, including stopping the use of custom audience lists.

Further information is available in the report into our internal review that is available on our website: [www.ird.govt.nz/customaudiencelists.](www.ird.govt.nz/customaudiencelists)

Right of review

If you disagree with my decision on your OIA request, you can ask an Inland Revenue review officer to review my decision. To ask for an internal review, please email the Commissioner of Inland Revenue at: commissionerscorrespondence@ird.govt.nz.

Alternatively, under section 28(3) of the OIA, you have the right to ask the Ombudsman to investigate and review my decision. You can contact the office of the Ombudsman by email at: info@ombudsman.parliament.nz.

If you choose to have an internal review, you can still ask the Ombudsman for a review.

Publishing of OIA response

We intend to publish our response to your request on Inland Revenue's website (www.ird.govt.nz) as this information may be of interest to other members of the public. This letter, with your personal details removed, will be published in its entirety. Publishing responses increases the availability of information to the public and is consistent with the OIA's purpose of enabling more effective participation in the making and administration of laws and policies and promoting the accountability of officials.

Thank you again for your request.

Yours sincerely

Pip Knight
Service Leader, Marketing & Communications

Social Media Policy and Guidelines for Inland Revenue Staff

Not in scope

Contents

Summary for personal and professional use

These guidelines cover how, as an IR staff member, to use social media personally, professionally and officially. The guidelines are in order of widest relevance to least relevance. Most IR staff will only need to read about how to use social media personally. Fewer will also need to read about how to use it professionally. Only staff using social media in compliance work will need to read Appendix 2. And only the handful of Marketing & Communications staff using social media officially will need to read Appendix 3.

Keep in mind the portions of IR's Code of Conduct regarding "mak[ing] the right decisions", being "mindful of the appropriateness of any private or public comment" and "maintain[ing] the political neutrality required to enable us to work with current and future governments" when using social media.

There must be a clear separation between your work role and your personal use of social media. Treat personal use of social media with the same carefulness that you would treat any public forum. Protect your information and that of IR, your colleagues and customers when using social media personally. Observe the guidance of CERT NZ as it relates to interacting online. And lastly, be a public servant, be responsible, credible, respectful and consistent. If you're unsure about personal use of social media, discuss with your Leader or approach the Integrity team.

When it comes to professional use of social media, run through the "Making the right decision checklist" in our Code of Conduct. Keep in mind that professional use is only for those where it is part of their job and adds value to IR. Those using social media professionally are not 'the voice of IR' and should make this clear. However, this distinction may not be possible for the likes of senior leaders. If you are thinking about using social media professionally, discuss this with your Leader.
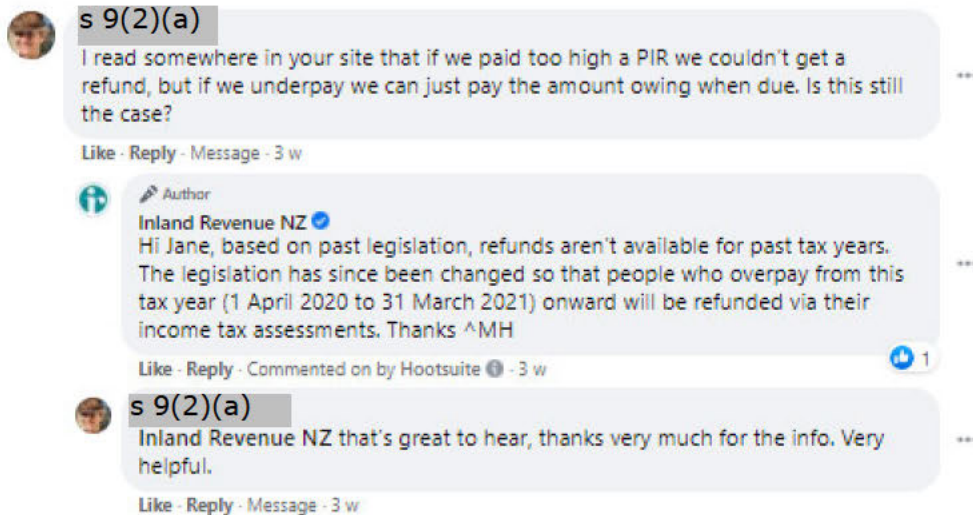
Email s 18(c)(i) if you have ideas for official social media content or want official social media support for a project.

Why we use social media

Social media can be a positive way to engage with our customers and our communities.

Inland Revenue has official social media accounts and engages with customers through these accounts to:

- Reach customers where they are to help them get it right from the start
- Build brand identity and trust
- Drive digital through digital channels
- Discover, escalate and resolve customer issues in conjunction with the contact centre
- Depress call demand through posts and customer replies seen by many

s 9(2)(a)

I read somewhere in your site that if we paid too high a PIR we couldn't get a refund, but if we underpay we can just pay the amount owing when due. Is this still the case?

Like · Reply · Message · 3 w

Author

Inland Revenue NZ ✓

Hi Jane, based on past legislation, refunds aren't available for past tax years. The legislation has since been changed so that people who overpay from this tax year (1 April 2020 to 31 March 2021) onward will be refunded via their income tax assessments. Thanks ^MH

Like · Reply · Commented on by Hootsuite ⓘ · 3 w   👍 1

s 9(2)(a)

Inland Revenue NZ that's great to hear, thanks very much for the info. Very helpful.

Like · Reply · Message · 3 w

Both the IR Code of Conduct and the Te Kawa Mataaho Public Service Commission's Standards of Integrity and Conduct apply to participation in social media as an official representative of Inland Revenue, as a professional and in your personal life.

Our Code of Conduct has the Te Kawa Mataaho Public Service Commission's Standards of Integrity & Conduct at its core and you should apply it to your social media activity. In particular, the portions of IR's Code of Conduct regarding "mak[ing] the right decisions", being "mindful of the appropriateness of any private or public comment" and "maintain[ing] the political neutrality required to enable us to work with current and future governments" quoted below.

- "While our Code summarises the essential expectations, it doesn't cover every possible requirement or situation. It provides principles, standards and tools to help you decide whether an action is appropriate… We all need to exercise good judgement in the decisions we make."

  - In the social media context, new platforms[1] and ways of engaging[2] are constantly emerging. So, it doesn't make sense to be prescriptive with our social media guidelines in relation to personal use. Rather, we'll outline what to consider and leave it to IR staff to make the right decisions and to approach their leaders if uncertain.

- "Generally, while working for IR you have the same rights of free speech and independent action as all New Zealanders. But you also have a duty to ensure any comments you make don't discredit or have the potential to discredit IR, the wider public sector or the Government.

  Be aware of the perception created by the comments you make and ensure it's clear that when you are commenting as a private individual, you are sharing your personal view and not acting as a representative of IR. If you are in a senior or high-profile role, it may be difficult for you to separate your personal views from public perception of you as an IR representative.

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[1] For example, TikTok exploding in popularity in 2020.

[2] For example, LinkedIn introducing the Stories feature worldwide in 2020.

Only specifically authorised staff [in the social media context, authorised staff typically means senior leaders who are working in conjunction with members of the Marketing & Communications team with social media responsibilities who give permission to post] can comment on IR matters or release IR material to any member of the media or public, or other organisation. Media includes anything that is being published or broadcast, such as…social media channels… Remember, you must treat all information, including knowledge of internal systems and processes gained while working for IR with care and confidentiality.

This requirement continues even when you stop working for IR.

- o In the personal use of social media context, you can't always control what becomes public. Private comments can become public on social media, so it always pays to think before posting material online and to exercise good judgement when sending a post.

- "Political neutrality and the perception of that neutrality is fundamental to the New Zealand Public Service. You must be impartial and always perform your role in a politically neutral way.

  You must ensure no comment, decision or action undermines or could be perceived to undermine the government of the day or future governments or suggests any political preference or intent to influence other's political persuasion."
  - o In the context of personal social media use, this means separating your personal political comments from work life. For example, not linking your personal political comments to your LinkedIn profile that identifies you as an IR employee.
  - o In the context of official use, this means not being seen as being biased towards or as advocating for a particular political party (e.g. moderating comments, linking announcements to 'the Government' not parties or politicians, presenting policy factually and responding to customer comments with explanations not opinions, justifications or endorsements).

- "Avoid any activities, work or non-work, that may harm the reputation of our organisation or of the State Services [Public Service]."
  - o In a personal use of social media context, your use is only a concern to IR if it harms the employment relationship. Trust and confidence will be

affected by social media use that involves unlawful conduct, a breach of the Code of Conduct or that otherwise brings IR into disrepute.

- "You must respect the privacy rights of our customers when dealing with their information. Only collect information you actually need, keep it secure, ensure it's accurate, and only use and disclose it lawfully. If dealing with requests to release information, you must follow specific IR procedures. You also need to ensure the confidentiality of all official information (including staff information)."

  o In personal, professional and official use of social media, you can never disclose customers' information.

- "You can refer a family member, friend or acquaintance only to information that is publicly available, including directing them to IR's website, myIR or our contact centre…unacceptable uses of knowledge and influence includes…giving information or assistance to an extended family member on how to deal with a dispute about tax, child support or a student loan, beyond what is publicly available."
  o On social media, it can be tempting to respond to others out of a good intention to help. But IR staff members are not encouraged to respond to customers on social media using their personal accounts. We can't give advice.
  o The Marketing & Communications team sees all comments directed to IR on social media and manages them in line with approved IR processes. They'll respond, where appropriate, as the official voice of IR. If you think they've missed a comment that warranted a reply, or given incorrect information, please email them - s 18(c)(i)

You're scrolling through Facebook after a hard day's work and you notice your cousin has posted a question about their child support. You happen to know a change is likely going to come into effect that will affect the answer to their question, but that change hasn't been published on our website or anywhere else yet.

How should you proceed?

At most, you could reply with a link to an IR webpage that answers their question as it would be answered now (i.e. pre-change). You'd let them know that if they have any further questions, they should send IR a message via myIR. Once the change is published on our website, you could send your cousin a link so they're kept up-to-date.

Personal use of social media

"Personal use" of social media is when used as an individual within personal networks outside of work time for non-work-related purposes. There must be a clear separation between your work role and your personal use of social media.

Personal use will generally occur on personal devices. IR policy does allow for limited personal use of IR tools (including the intranet and social media) with management approval.
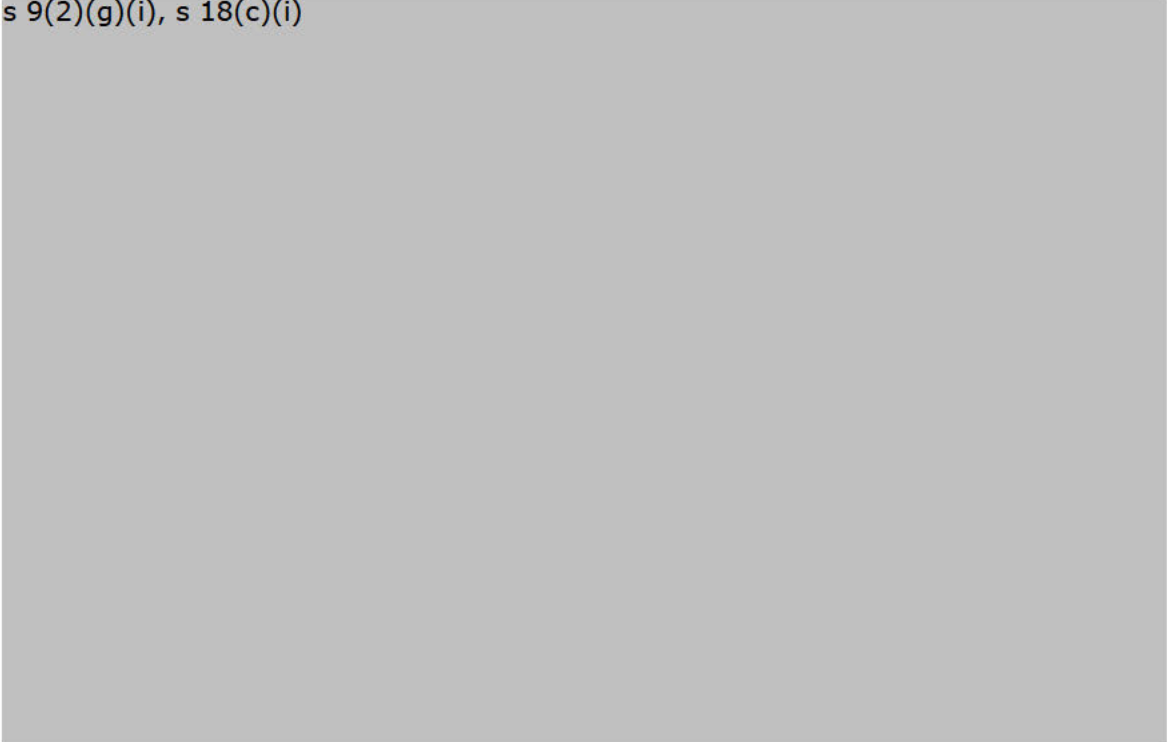
Examples of personal use include:

- Updating your personal social media profile on Facebook, Twitter, LinkedIn, Instagram etc.
- Commenting on news sites, blogs, forums or Wikipedia.
- Writing a blog post.

Staff should participate in the same way as they would with other media or public forums such as speaking at conferences or what you would say on the phone or in other official communications. There are always consequences to what you write.

- Always remember that participation online results in your comments being permanently available and open to being republished in other media.
- Stay within the legal framework and be aware that defamation, copyright and privacy laws, information management, tax confidentiality obligations and web standards apply.
- Use of social media should follow a process that is clearly displayed on the platform. That process should cover membership, rules, administration and moderation of content.

Remember: if you're unsure about anything, discuss your proposed post with your Leader or approach Integrity Assurance.

s 9(2)(g)(i), s 18(c)(i)

Specific considerations

The general principle of using social media in a personal capacity while you work at IR is to use common sense. To protect your information and that of IR, your colleagues and customers, you should remember that:

- Everything you say online is essentially public and permanent.
- You can't control your posts once they're out there. Your content can be copied and republished without your consent. This includes when your content is restricted to 'friends'.
- New Zealand is a very small country – everyone is connected to everyone else.
- Other people, including the media, may use what you say, even when it's your own opinion and said outside work hours, to attack you, your colleagues or IR – even if you haven't said anything that bad.
- Employers often search for people's Facebook or other social accounts during the recruitment process.

- You are bound by the confidentiality provisions in the Tax Administration Act 1994, even after you have left Inland Revenue. This means you cannot post on social media any sensitive revenue information you have accessed, obtained, used or held that relates to Inland Revenue or taxpayers.

We acknowledge that many of our people use social media. We don't wish to stop that but ask that you be mindful of the public perception of your behaviour when linked to IR, including the people you choose to connect and follow on social media. Remember as public servants you have an obligation to remain politically neutral, which means avoiding making public comment which might be, or seem to be, critical of government policy.

Consider carefully whether to identify yourself as an IR employee on social media, and where possible avoid it. If you do mention IR, you should include a statement like "All opinions are my own, not Inland Revenue's."

If you operate your own website, managing social media risks may involve moderating content on your site or responding to posts.

If you are profiting from your social media activity (e.g. being paid for posts as an influencer), be mindful of any clauses in your employment agreement regarding income outside of IR and your tax obligations.

Protect yourself online

We recommend Inland Revenue staff observe the guidance of the Privacy Commissioner as it relates to interacting online.

The Privacy Commissioner recommends the following when interacting online:

- Carefully choose how much personal information you post or share online.
- Use privacy settings and categories such as 'friends only' to limit who can see your information.
- Don't put date of birth, your mother's maiden name or contact details on your page.
- Think before you upload.
- Get consent from friends and family before posting information or photos about them.
- Be wary of people you don't know.

- Read the social media platform's privacy policy regularly – ensure you set your notifications to tell you when it changes.

Basic principles for staff

There are some common principles shared across all forms of social media. Knowing these basic 'rules of engagement' will serve staff well.

- Be a public servant – Remember that you are an ambassador for IR. This includes your personal social media use. Do not disclose information you learned through your work or which is not in the public arena.
- Be responsible - Avoid commenting on matters which could get you or IR in trouble and remember your responsibility as a public servant. You are personally responsible for content you publish on your personal social networks. Your actions should not be seen or perceived as undermining the integrity and security of our information or organisation.
- Be credible – Be accurate, fair, thorough, and transparent. Act with trust and integrity, handling sensitive information appropriately. Keep customers' information private. Do not post anything that breaches copyright or any other law, including suppression orders.
- Be respectful – Do not post anything that is racist, sexist, defamatory, bullying, obscene, deliberately inflammatory or abusive.
- Be consistent – Encourage constructive criticism and deliberation. Be cordial, honest and professional at all times. It is never a good idea to air workplace grievances online.

Professional use of social media in a non-official capacity

"Professional use" of social media is when used as an Inland Revenue staff member to improve collaboration between government agencies or within a single agency. Determining how to engage should involve running through the "Making the right decision checklist" in our Code of Conduct. Is what you want to do on social media "legal…fair…free from any bias…likely to be misunderstood…open to scrutiny…[and] sensible?"

How do you handle participating in an online community/network where you make a contribution based on your work at IR or your personal knowledge?

This is normally done as part of your job, but you are not 'the voice of IR'.

Examples may include:

- Internal social media with only IR members.
- Cross-government with members from other government agencies.
- Communities that include Government and non-Government employees.

You've been asked to take part in an international conference on Hidden Economy. The organisers have set up a conference hashtag and have encouraged participants to use social media to share their thoughts, using the hashtag, so you can all see what each other are thinking.

How should you proceed?

This would be a case of professional use of social media. In this situation we encourage you to engage with your peers, use the hashtag and tweet up a storm. Be mindful that even though you're using your personal social media account to do this, you are participating on behalf of IR. Be sure not to put yourself or IR in a compromising position by making an inappropriate comment.

Another example, you've been invited to join the GovtWeb Yammer network and are keen to get posting. The GovtWeb Yammer is a cross-government network where people who work in government can discuss things online and collaborate. You've spotted that there is a post that asks people to share their opinions on health and safety policies in their workplace. You don't work in health and safety in IR, but you did in your last job and have some thoughts you'd like to share.

How should you proceed?

This would also be a case of professional use of social media. You are only able to participate because you are a government employee so you should consider your position in IR and respond appropriately. Think about whether your opinion might contradict an official position IR has. If in doubt, do not post. We encourage you to collaborate and share information across government but ask that you limit participation in professional social media networks during work time unless this is a requirement of your role.

Specific considerations

- Identify yourself as an IR employee and state on your profile that your views do not represent those of IR.
- Do not discuss confidential or sensitive revenue information that you have accessed, obtained or held as an IR employee.
- Be proactive in sharing information you come across with your colleagues. Invite people to join relevant conversations or networks you find.
- When you are thinking about joining a professional network, discuss this with your team leader. Points to think about are:
    o How do you add value to the group?
    o How does your membership form part of your personal development and/or widen your professional networks?
    o How will you on-share any information with your IR colleagues?
    o What information will you share or not share?
    o Will there be any conflicts of interest that may arise?

Special position holders and professional use of social media

- Special position holders, such as senior leaders, have a special level of responsibility which isn't covered by just using common sense and posting a

disclaimer. As senior people within IR, your statements can easily be misread as representing the position and policy of IR.

- Please take extra care when using social media, as your actions will reflect directly on the organisation.

When you have an idea for, or need for, official social media

Great social media content adds value for the people who will see it. It's useful, interesting and can even be fun or entertaining. We post about things we care about beyond tax and entitlements too. For example, celebrating Māori Language week. If you have a content idea for IR's social media's accounts, email it to s 18(c)(i) . We welcome your content ideas any time. If you want to receive our call for social media content monthly, join the mailing list by emailing s 18(c)(i)

You can also contact the Marketing & Communications team via s 18(c)(i) if you want social media support for your project.

## Appendix 1 – Further reading

IR's Code of Conduct – Tikanga Whanonga	https://irnz.sharepoint.com/sites/CORP-people-and-workplace-services/Shared%20Documents/Our-Code-of-Conduct.pdf
Te Kawa Mataaho Public Service Commission's Standards of Integrity and Conduct	https://www.publicservice.govt.nz/our-work/integrityandconduct/
IR's social media community guidelines	https://www.ird.govt.nz/about-this-site/conditions-of-use/social-media-pages-and-engagement-website
IR's privacy policy	https://www.ird.govt.nz/about-this-site/your-privacy/privacy-policy
Te Kawa Mataaho Public Service Commission's social media guidance	https://www.publicservice.govt.nz/guidance/guidance-use-of-social-media-for-public-servants/
Privacy Act 2020	https://www.legislation.govt.nz/act/public/2020/0031/latest/LMS23223.html
Te Kawa Mataaho Public Service Commission's Election Guidance – S4 in particular	https://www.publicservice.govt.nz/our-work/parliamentary-election-2020/general-election-guidance-2020/
Tax Administration Act – particularly Section 18 – Confidentiality of sensitive revenue information	http://legislation.govt.nz/act/public/1994/0166/latest/whole.html#DLM356617
IR's Information and Knowledge Management Guidelines	https://irnz.sharepoint.com/sites/information-and-knowledge/SitePages/IKM-Resources.aspx
Privacy Commissioner	https://www.privacy.org.nz/search/SearchForm?Search=social+media&action_results=Go

IR's ASO covering how custom/matched audiences will be handled with advertising agencies	See Marketing & Communications team
IR's social media who [does] what when spreadsheet	See Marketing & Communications team
IR's 'back pocket' stock answers to customers	See Marketing & Communications team
Te Kawa Mataaho Public Service Commission's Political Neutrality Guidance	https:// www.publicservice.govt.nz/role-and-purpose/principles-and-values/politically-neutral/
Guidelines for Government Advertising	https://dpmc.govt.nz/sites/default/files/2017-03/guidelines-govt-advertising-20nov1989.pdf
Official Information Act 1982	http://www.legislation.govt.nz/act/public/1982/0156/latest/whole.html
IR Official Social Media Accounts	https://www.ird.govt.nz/about-us/social-media

Appendix 2 - Guidelines for the use of social media in IR's compliance work

s 18(c)(i)

s 18(c)(i)

s 18(c)(i)
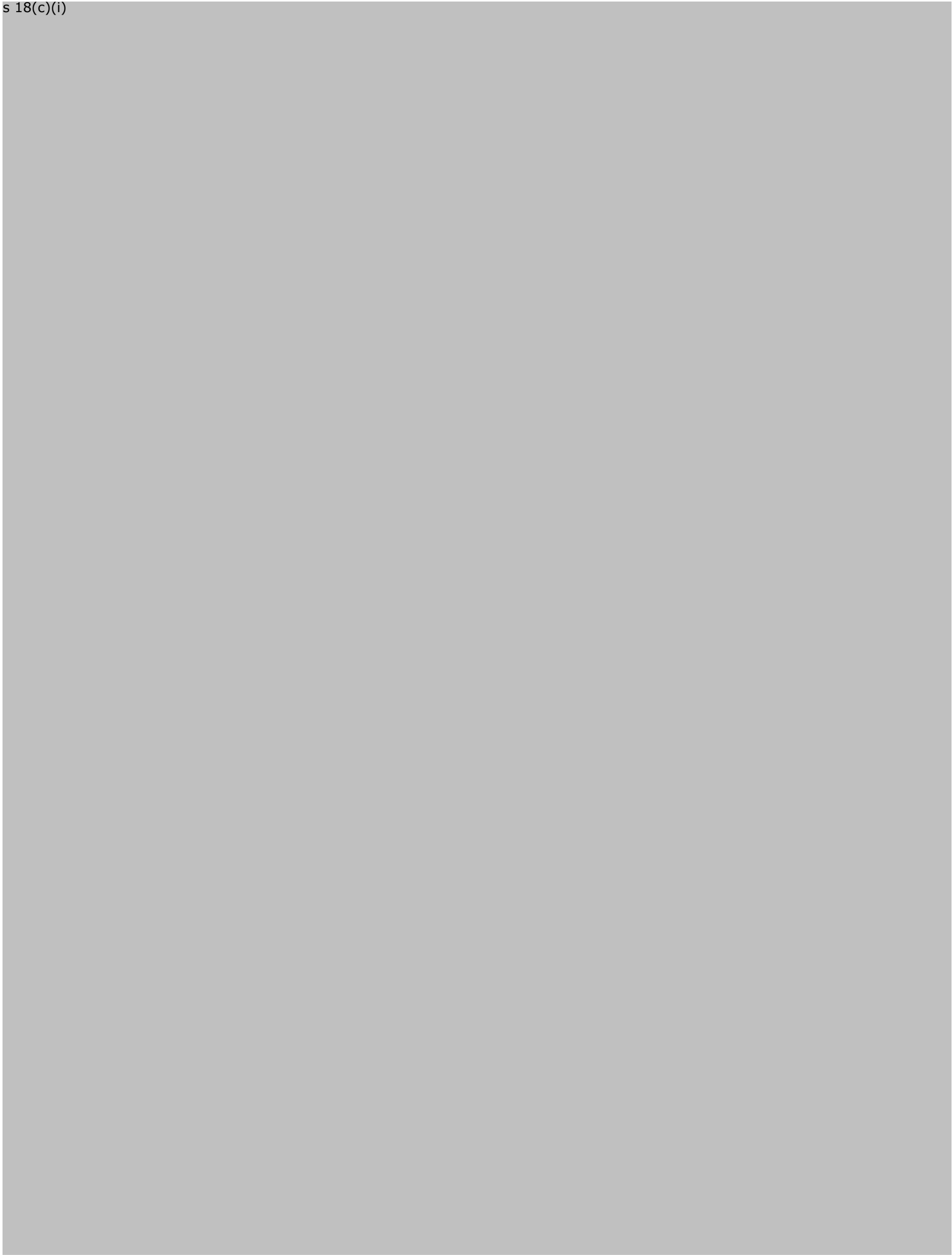
Appendix 3 – Official use of social media

Core responsibilities under the Standards of Integrity and Conduct and Political Neutrality Guidance underpin how we should use social media in an official capacity.

Policy

This policy applies to all Inland Revenue staff.

This policy does not form part of any employment agreement and Inland Revenue may, from time to time, amend or revoke it.

Definitions

When we say "Inland Revenue staff" we mean the following groups:

- Inland Revenue employees, including those on all types of leave except those on leave without pay
- Inland Revenue employees on leave without pay if carrying out Inland Revenue's business
- secondees to Inland Revenue
- contract and temporary staff.

It excludes:

- non-executive Board and Committee members, unless carrying out Inland Revenue's business.

When we talk about "social media" we mean websites and applications that enable users to create and share content or to participate in social networking, internally or externally.

"Official use" of social media is by an official representative who by the nature of their role are required to speak on the behalf of the Commissioner or Inland Revenue. For example, tweeting from IR's Twitter account.

A "third-party application" is a program written to work with the social media platforms but written by third parties other than the provider of the platforms. Usually these applications are small plugins that add functionality to the platforms

Policy statement

Inland Revenue requires all social media accounts that represent an aspect of the Inland Revenue brand to be approved prior to use, and all interactions to be appropriately recorded.

General principles

- Be a public servant – Remember that you are an ambassador for IR. This includes your use in a professional capacity and extends to being the voice of IR through an official channel, where you should state that you are a representative only. Do not disclose information you learned through your work or which is not in the public arena.
- Be responsible - The general principle is that Inland Revenue staff must act with common sense when it comes to social media. Remember your responsibility as a public servant. You are personally responsible for content you publish on behalf of Inland Revenue as an official spokesperson. Your actions should not be seen or perceived as undermining the integrity and security of our information or organisation.
- Be responsive – Answer questions in a timely manner. Share your insights where appropriate. Monitor for opportunities to innovate and engage in new ways and take considered risks. Feedback will be considered for improving our services, whether it is solicited or not.
- Be integrated – Wherever possible align online participation with other offline communications. Involve other IR units in planning social media uptake and strategies and provide connected services with our external partners.
- Be a good custodian – If you're managing IR's social media accounts, make sure that you're posting content and checking messages regularly. An untended and out-of-date account looks unprofessional. Also ensure that information is created, kept and, if necessary, disposed of in accordance with organisational policies.

Recording and approvals

Request for new social media platform or account

Internal and external social media accounts that represent an aspect of the Inland Revenue brand must be approved in writing by Marketing & Communications prior to use.

To ensure the security of our information and IR systems, all social media platforms must be approved for use. If you have reason to engage in a new platform, you must ensure this receives the proper approvals from across IR e.g. a cloud computing assessment by IT, approval to purchase software licenses. These will often be included in a business case.

Inland Revenue's use of internal or external social media will be consistent with IR's Web Governance Framework.

A social media account owner must be agreed prior to creation and recorded with Marketing & Communications. All financial and compliance obligations are the responsibility of the social media account owner (or chosen delegate), unless agreed otherwise.

Approval to post on social media platform or account

Marketing & Communications will approve all content that is to be posted on an Inland Revenue branded social media account. This approval is final and consistent with all risks accepted under IR's Risk Management Policy and Framework.

Marketing & Communications reserve the right to edit any content provided by subject matter experts or partners for length or style, provided the content retains its legal meaning and is consistent with prior advice given by the Commissioner of Inland Revenue.

A social media owner must be agreed and recorded with Marketing & Communications. All financial and compliance obligations are the responsibility of the social media owner (or chosen delegate), unless agreed otherwise.

Recording social media activity

Social media accounts must follow IR's information management principles. As digital interactions can be fleeting and immediate, it is essential that we capture, maintain and monitor our interactions in the digital social media arena.

Inland Revenue will meet all information management obligations under the Public Records Act 2005, Official Information Act 1982, Tax Administration Act 1994 or Privacy Act 2020 in both recording activity and disposing of records. This includes compliance with the following:

Best practice guidance on digital storage and preservation

Information and record management standard

Social media content will be reviewed quarterly to ensure consistency with objectives and merit of continued use. This review will be conducted by Marketing & Communications in coordination with the social media owner.

Governance and security

Account security

Social media accounts must use s 18(c)(i) as the recovery email to ensure access can be recovered in the event of a breach. Access to this group email is controlled through the online catalogue.

Passwords for social media accounts, social media monitoring tools and Inland Revenue-issued mobile devices must comply with all relevant Information Security Standards, in particular the Authentication Control Standard and the Mobile Device Security Standard.

Marketing & Communications will maintain a register of all social media accounts including social media account owners and review history.

Inland Revenue social media accounts must use two-factor authentication wherever possible. Preferred choice is a text verification code to an Inland Revenue-issued mobile device.

Third-party applications and users may be linked to Inland Revenue social media accounts if approved by Marketing & Communications.

Social media accounts will be reviewed annually to ensure consistency with objectives and merit of continued use. This review will be conducted by Marketing & Communications in coordination with the social media account owner.

User access and security review

Inland Revenue will conduct a user access and security review every 45 days to confirm there are no errors or unauthorised changes to security and privacy settings. The following activities are performed:

- review of third-party applications or user accounts, removal if required

- review of security settings, updates as required
- review of privacy settings, updates as required
- update password
- record result of review in social media account register.

Upholding confidentiality of information

Inland Revenue's use of social media will comply with the confidentiality provisions in the Tax Administration Act 1994, in particular Section 18 as well as the Privacy Act 2020.

Inland Revenue's use of social media will maintain the privacy and integrity of Inland Revenue staff information. If an Inland Revenue staff member has been named in a complaint received via social media the first response is no response. If it is thought by Marketing & Communications that not to respond would result in significant damage to our brand or reputation, the Team Lead – Complaints Management will be included in the decision-making process regarding if and what to respond.

We must also respect and protect people's personal information in the information or content we share on social media that relates to an identifiable individual (whether they are a member of the public or an IR staff member). People need to give consent for the information to be shared (e.g. ask every staff member who is identifiable in a photograph if you can post that photograph on social media before you do).

Consent of the person affected itself is not enough to justify disclosure. Section 18 confidentiality cannot be waived by consent. The disclosure must come within a permitted disclosure i.e. it must be reasonably necessary to disclose the photo in order to carry into effect the administration of the tax system i.e. there is a sound business reason to also include photos. If the addition of the photos does not add anything more to the effective administration of the tax system, then they should not be published.

On occasion, we will post about prosecutions that have been published elsewhere (e.g. in an IR press release) that identify individuals without seeking the permission of those individuals.

Monitoring social media

Requests for social media monitoring are actioned through Marketing & Communications, including configuration. Training will be provided to the requestor (or delegate) to use the relevant tools on an on-going basis.

Social media monitoring will be reviewed quarterly to ensure consistency with objectives and merit of continued use. This review will be conducted by Marketing & Communications in coordination with the requestor.

Practice

You have been tasked by your leader to manage the IR Twitter account for a day. This has been signed off by Marketing & Communications and you've been through training. Someone has tweeted at IR asking about resetting their password for myIR.

How should you proceed?

This would be a case of official use of social media. You locate the answer in the 'back pocket' stock answers or on ird.govt.nz, write the tweet and then send this for approval (if required) using the approval process you learned in your training. Once the tweet is approved, it will be published.

Specific considerations

- If you are participating on behalf of IR as an individual, disclose your position as a representative of IR unless there are exceptional circumstances, such as a potential threat to personal security. Never give out personal details like home address and phone numbers.
- Ensure you are free from compromising your personal interests or appearing to compromise your responsibilities to IR by acting as a spokesperson for IR.
- Representatives are expected to use sound judgment and common sense to prevent online social media applications from becoming a distraction at work or a misuse of business tools.
- Make sure you are clear on the approval process for publishing content on each individual platform and adhere to these.

Before you start, take the time to really think about and define why social media is the best option in achieving your desired outcomes.

You need to consider things such as:

- Think of the customer needs first, then IR and government needs – your goals and objectives need to be aligned with customer needs
- your target audience(s)
- how using social media meets the needs of the customer and helps achieve your objective
- compliance with relevant legislation, policy and standards including tax confidentiality
- the benefits, risks and mitigations for those risks
- the on-going resources required, including reporting
- your measure for success
- assigning an owner to participate in content creation and to update content in future

Publishing on social media

Content should be relevant, simple, adaptive and responsive. Social media content should be developed as part of a content package, supported through traditional channels (or vice versa) so that it doesn't exist in isolation. When creating traditional content, consider how you can keep content 'alive' through social media, even after the initial event or promotion has ended. Is there opportunity for an infographic to be created? Are there some top tips that can be shared?

Broadly speaking, you need to go through the following stages before anything is published:

- initial needs analysis, both for the customer and for IR
- research and content planning, including ensuring accessibility and usability needs will be met
    - value our customers and your colleagues by listening to needs, educating and supporting self-management, providing useful and informative content, ensuring it meets the needs of people with disabilities
- content creation
- run content through the making the right decision checklist in the Code of Conduct
    - Is it legal?
    - Is it fair?
    - Is it free from any bias?
    - Is it likely to be misunderstood?
    - Is it open to scrutiny?
    - Is it sensible?
- editorial review
- fact check
- approval
- publication
- set review/retire dates.

Social media must follow IR's information management principles. As digital interactions can be fleeting and immediate, it is essential that we capture, maintain and monitor our interactions in the digital social media arena.

Information shared on social media must be classified as PUBLIC – that is, information we are happy to have freely accessible to the public.

See IR's content strategy within the FY23 social media strategy.

All social media interactions must incorporate IR's brand rules and guidelines.

Resourcing and responsiveness

Resource planning for social media is especially important. If not well managed, information can appear ad hoc and disorganised. Consider the resource required to:

- create content
- distribute content
- publicise content
- respond to any queries
- monitor and evaluate performance
- keep content updated.

Resources may also be needed to create back-ups, transcripts, and other records of social media activity. The level of resourcing required will differ across social media channels. Make sure you have engaged the right people in your planning process to avoid hidden costs e.g. videos require translations and transcripts, but tweets do not.

Social media tools require quick responses and direct communication with stakeholders, often in real or near-real time. Nothing kills the effectiveness of a social media project more quickly than slow response times where each and every statement or tweet needs to go up the chain of command to be approved before publication.

Benefit and risk analysis

As with any communications channel, there are benefits and risks to using social media. Before you actually start using these tools, it is important to assess these benefits and risks adequately.

Social media can bring a variety of benefits in supporting IR's communications and wider objectives, including:

- Increase audience reach and improve the accessibility of communication
- Reflect the communication channel preferences of many New Zealanders
- Meet public expectations of modern service organisations and enhance reputation
- Promote transparency in government
- Support more involved relationships with citizens, partners and other stakeholders
- Enhance our ability to quickly adjust or refocus communications
- Improve the long-term cost-effectiveness of communication
- Benefit from the credibility of non-government channels
- Increase the speed of public feedback and input
- Reach specific audiences on specific issues
- Reduce dependence on media and counter inaccurate press coverage
- Lead New Zealanders directly to online transactional services.

Because social media is an evolving area of government engagement, there are risks. These can be cultural, technical or reputational and must be factored into planning. But they should not dissuade you from using social media. Over time, as experience builds and case studies provide us with precedents, risks will be more easily identified and reduced.

Risks in using social media include:

- IR activity in some social media websites and forums may not be welcome
- A post may be inaccurate or inappropriate, creating legal or reputational risk
- Some sites may be open to manipulation by interest groups or those with malicious intent
- User generated content may be difficult to check for accuracy
- Negative impact on a community when a public figure has to pull out of a debate
- Greater resource requirements than expected
- Comments may unintentionally inflame a situation
- Without appropriate planning, you may not be able to meet information management obligations under the Public Records Act 2005, Official Information Act 1982, Tax Administration Act 1994 or Privacy Act 2020.
- Risk of 'guilt by association' with other individuals and organisations on social media. We must consider how our interactions with other social media accounts could be perceived. To mitigate this risk at IR, only link to, follow and interact with other New Zealand government organisations (never political figures):
  - Only link to govt.nz webpages
  - Only follow other New Zealand government organisations on Twitter (and follow no one on our other social media channels)
  - Only judiciously repost other NZ Govt organisations via our social media accounts
  - Don't like any posts or comments
  - Only use the social media 'handles' of other NZ Govt organisations

If you are engaging on social media and have identified risks, you are expected to consider and apply mitigations to these risks.

Other legal considerations

A number of legal issues can arise through the use of social media. Most legal issues are avoided by exercising common sense and observing existing codes of conduct. At the same time, it is important to understand the legal parameters that IR is operating in, particularly when the rapid pace of development and some of the unique dynamics of social media may give rise to unfamiliar or ambiguous legal issues. As IR employees we need to ensure we uphold the requirements of the Tax Administration Act 1994, particularly in relation to Section 18 regarding tax confidentiality.
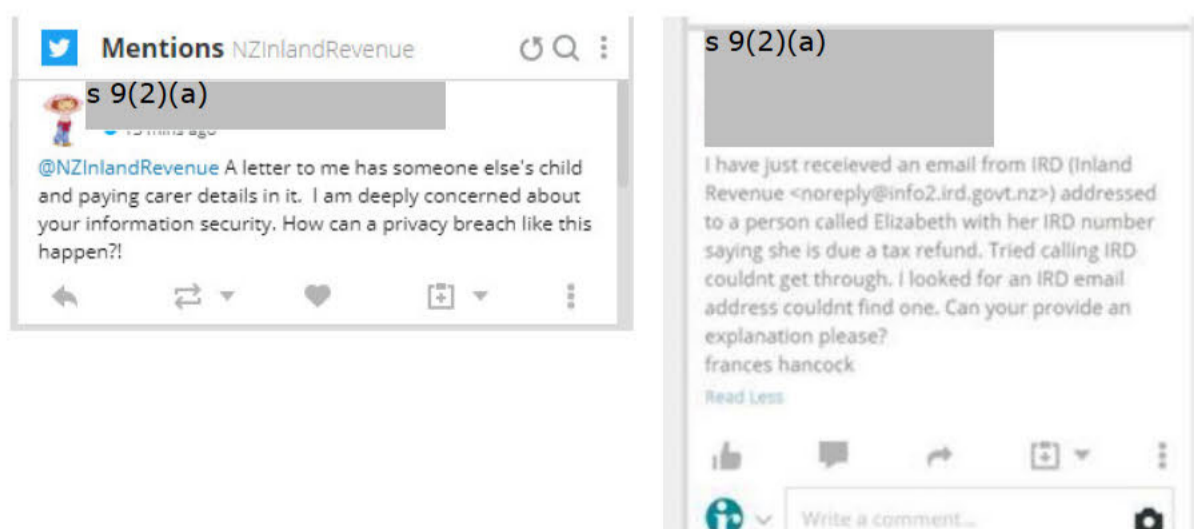
Processes

These processes are for staff involved with the official use of IR's social media accounts to use. They cover off how to respond to customers and administration areas.

Privacy breach

Please note, if the customer received a letter addressed to someone that used to live at their address but didn't open it, just ask them to return to sender. Then hide the customer's comment and your response. This is all you need to do in this case (i.e. you don't need to follow the below process).

When dealing with a possible privacy breach, do not engage in further discussion of details on social media or seek contact details on social media. It is better to move offline ASAP. It is important to go through the steps in the process outlined below quickly. Because social media is the fastest way for customers to contact IR, you may be the first to learn of a possible privacy breach so it's important to immediately pass information on internally.

Examples of customer comments that indicate a possible privacy breach:

Mentions NZInlandRevenue

s 9(2)(a)

@NZInlandRevenue A letter to me has someone else's child and paying carer details in it. I am deeply concerned about your information security. How can a privacy breach like this happen?!

s 9(2)(a)

I have just received an email from IRD (Inland Revenue <noreply@info2.ird.govt.nz>) addressed to a person called Elizabeth with her IRD number saying she is due a tax refund. Tried calling IRD couldnt get through. I looked for an IRD email address couldnt find one. Can your provide an explanation please?
frances hancock
Read Less

Write a comment...

Steps

1. Hide the customer's comment.

2. Email a summary of the information you have to:
   a. Dawn Swan, Privacy Officer
      i. s 9(2)(a)
   b. The Incident Team
      i. s 18(c)(i)
   c. The Media team (just in case this gets picked up or they have heard something)
      i. s 18(c)(i)

3. Separately email the social media owner, the Marketing Manager and the Marketing & Communications Service Leader with a draft response* to the customer for the Marketing Manager to approve.

4. Post the approved response to the customer on social media. Then hide your post.

5. Separately email Complaints Management with a heads up that includes all of the info you have to prepare them to prioritise this customer contact.
   i. s 18(c)(i)

You're now done!

6. FYI Complaints Management will collect more info and, if required, complete a privacy breach form. If the customer doesn't contact Complaints Management, they will use the information gleaned from social media.

7. FYI The Incident Team will action an investigation based on the information on the privacy breach form if necessary. They may decide to notify the customer who had their privacy breached and/or issue an apology.

*Potential starter response. Always ask the customer to raise with Complaints Management.

Hi [Name] - We take privacy seriously. Please contact our Complaints Management team as soon as you can on 0800 274 138. They will collect information so that we can examine this urgently. Thanks ^XX

Threat against an IR staff member or office

If a customer on social media makes a threat against a specific IR staff member or an IR office, hide the comment then contact Corporate Security s 18(c)(i)   or s 18(c)(i)

Suicide threat

If you receive a comment on social media suggesting a suicide threat, hide it, reply with the below message, then hide your reply.

Hi [name], we care about the safety of all New Zealanders and your mention of self harm concerned us. You need to let us know now if you're serious. If you indicate that you are, we will contact NZ Police so they can check that you're OK. ^XX

If the customer does not reply and you cannot find identifying details, do not take any further action. Discuss with Corporate Security if you hold concerns for the customer's safety.

If the customer replies that they were not serious, do not take further action.

If the customer indicates that they are serious, or the customer does not reply but you think they may be serious, and you can find identifying details, call the Police on 111.

Give the Police this information if you have it:

- Verbatim account of what the person wrote that they would do.
- Full name, date of birth and address of the person making the threat and their present whereabouts if known.

- An alternative address if possible.
- Date and time of the comment.
- Your name and contact number.

Don't give the Police any other customer information (e.g. customer's history with IR or what might have prompted the threat) Contact Corporate Security for advice if Police request to listen to a recording of the conversation.

Ask for a follow-up call from the Police Officer or unit assigned to attend along with an incident number for our reference and for the security incident report. If you do not have access required to do a security report (requires START access), email s 9(2)(a) and s 9(2)(a) and ask them to do one on your behalf.

If the Police require customer specific information, or you have any queries on this process, please contact Corporate Security to discuss.

Staff personally responding to customers on social media or posting about IR

When the social media moderator notices a staff member giving detailed or personalised tax advice on social media or posting about IR, they advise the social media owner who then sends an email like the below to that staff member and their leader.

Hi,

I'm from the Marketing & Communications team here at IR. We manage IR's social media channels.

We spotted that you recently responded to a customer question OR posted about IR on X channel.

I know it's tempting to respond to others out of a good intention to help. But please note our Code of Conduct outlines that we can't give customers advice outside of work beyond pointing them to publicly available information like an ird.govt.nz webpage.

OR our Code of Conduct outlines that only specially authorised staff can comment on IR matters or release IR material to any member of the media or public, or other organisation. Media includes anything that is being published or broadcast, such as social media channels.

Our team sees all comments directed to IR on social media and manages them in line with approved IR processes. We'll respond OR Post, where appropriate, as the official voice of IR. Do let us know if you think we've missed something or got something wrong 😊

Kind regards,

Review of in-house social media posts and ads

Draft your text.

Get your SME and/or internal stakeholders to review for technical accuracy.

If you're using a custom audience, ask the social media owner to run by Albert Lim.

Upload into Facebook Business Manager, LinkedIn Campaign Manager and/or Hootsuite as a draft with your creative.

Let the social media and content owners know so they can coordinate required approvals from Marketing management and the social media owner can publish/schedule.

Check the platform as needed to make sure all is going according to plan (e.g. post published, ad is getting sufficient clicks).

Note, all content that could be considered as advertising must be consistent with the Guidelines for Government Advertising. In line with marketing practice, our social media posts and ads should inform customers about the impact of policy on them, our services, or their entitlements and encourage compliance. All content must be justifiable.

In the lead up to an election, particularly the weeks voting is open, consider adding additional approval steps. For example, in the months before the 2020 election the Service Leader of Marketing & Communications reviewed scheduled posts and ads. In the weeks before, the Senior Communications Advisor, Media also reviewed. In the weeks voting was open, only two operational posts went out (a post re. offices reopening and a post re. advanced notice of planned maintenance that made myIR temporarily inaccessible).

Responding to customer comments

Use Hootsuite and other tools to monitor customer comments on our Facebook, LinkedIn, Twitter, YouTube, and Google My Business accounts.

Hide or delete comments that breach our community guidelines.
Record in our Spam and Blocked Accounts spreadsheet as needed.

Read but don't respond to comments that don't warrant a response.
Advise customers seeking personised advice to send us a message in myIR.

Customise the 'back pockets' to respond to other comments.
If there's no 'back pocket' and the question is rare, see if you can find the answer on ird.govt.nz and reply with a link. Next step is asking the Contact Centre if they know the answer.

If there's no 'back pocket' for a question that has become commonly asked, ask the social media owner to draft one with SMEs.

If the comment reveals a previously unknown fault, inform the relevant staff within IR.

The Marketing & Communications team maintains a list of stock answers to customer queries called the 'back pockets'.

Note: If an Inland Revenue staff member has been named, the first response is no response. If it is thought by Marketing & Communications that not to respond would result in significant damage to our brand or reputation, the Team Lead – Complaints Management will be included in the decision-making process regarding if and what to respond.

Marketing Campaign Guide

Welcome to Marketing!

This Guide sets out how we manage campaigns at Inland Revenue (IR). It sets out the key processes that will help get you up and running. At the end of this Guide is a WIP list – you can use this to keep on top of all your key tasks as you're developing your campaign.

If you find any links are broken, please let the team know.

Contents

The Marketing calendar – how new activity is forecast

Every year the Marketing Manager creates and agrees with the team on the marketing plan for the year. This is made up of annual or 'always on' campaigns (e.g.: End of Tax Year "EOTY"), as well as any campaigns driven by new policy or projects. The marketing calendar is shared with the Service Leader of Marketing & Communications and the CCSLT group for approval.

Planning documents are kept in our SharePoint site under Marketing/Planning/. Check out the 2024 - 2025 marketing activity calendar.xlsx.

Getting started

To ensure the campaign is 'fit-for-purpose' and the relevant stakeholders are all in agreement, complete the campaign one-pager document . it is recommended to get that peer-reviewed by a principal in the marketing team and the Marketing Manager.

Campaign sign-off

At a minimum you'll need to:

1. Prepare the marketing scoping document "the one-pager"
2. Peer-review your one pager or marketing plan with someone else in Marketing
3. Get sign-off from the Marketing Manager
4. Get sign-off from the product owner and/or elected technical leads.

All campaigns require a business impact assessment (BIA) and approval from the Collaboration Team to go ahead. This process is covered off in the next section.

Note:

For all signatures, be clear what their jurisdiction/delegation is for the sign-off. You can document signoffs in your marketing campaign brief RASCI and/or save the relevant email replies in your SharePoint folder.

Business Impact Assessments

Once the campaign brief is approved and the initial campaign population numbers have been provided by the relevant data analyst, send these details to the Workflow inbox: s 18(c)(i) . The Workflow team will develop a BIA (Business Impact Assessment) and present this to the Collaboration team who will assess and prioritise it against other activity forecasted.

Process for instigating a BIA

An email should be sent to Workflow early on when the campaign population is being scoped. It should include:

1. The key message(s)
2. The planned 'in-market' dates (this should include each direct marketing deployment if there are multiple. Make it clear if dates are flexible and if possible, provide other date options in case plan A is not possible)
3. The call-to-action (CTA)
4. The volume being sent within each channel (letters vs email)
5. Estimated response rate (based on similar campaigns run before, or on the same campaign that's been run in previous years)

Advertising

IR deals with a range of advertising and creative agencies. Most of our campaigns run on an advertising budget of less than $150k.

Cost centre

Marketing's cost centre is s 9(2)(i) The natural account – s 9(2)(i) [Advertising].

Process for campaigns >$150K

For campaigns >$150k you need to engage Procurement. The process is as follows:

- Draft any necessary DFAs for the Marketing Manager's review. They will help manage the liaison with Ministerial services and necessary approvals to streamline this process.
- Decide on any agency requirements based on the nature and scale of the work and the selection criteria. If you decide to go to tender then procurement can assist but they need approximately 10 weeks' notice.

- Follow the rest of the process as detailed in the section below.

Briefing and working with an agency

1. Send the campaign brief, and arrange the first face-to-face meeting with the agency to go through the brief
2. At the initial meeting agree outputs (i.e., concepts, media, production) / costs / timeframes for deliverables / monitoring and reporting expectations)
3. Create an:
   a. advertising services order (ASO) or
   b. design services order (DSO) if working with a design-only agency; and
   c. contract cover note (CCN) if there is no existing relationship between IR and the supplier.
   d. Then send these to procurement: s 9(2)(a)
4. Once signed, raise a purchase order (PO) in Atea, attaching your ASO/DSO and CCN documents. The process for raising a PO is covered off in the next section
5. Receive and review campaign concepts and draft media plan. For larger campaigns more than one concept may be presented to test internally with our CI&E (Research) team
6. Concepts and media plan should be peer-reviewed with the Marketing Manager and ideally one other marketing team member for feedback
7. Provide feedback on the concepts and media plan. Revised concepts and the media plan will be sent to us for review and approval
8. Production of all campaign assets – sent to us for review and approval
9. Campaign in market
10. Have regular WIP meetings with the agency and keep a record (i.e., emails/notes) of any actions/areas for improvement.
11. Conduct a post implementation review (PIR) at the end of the campaign. The agency will need to provide you with a post campaign report (PCR). Make sure this is included in your early briefing.
12. Advise marketing manager of any performance concerns or issues if they occur so they can help support your conversations regarding these.

Consider what channels are being used in addition to advertising channels and what assets you might need for those. Campaign creative and messaging should be consistent across all channels:

- o Direct marketing
- o Advertising
- o Social media

- o Website (campaign landing page, homepage promo)
- o Front of house (FOH)
- o Newsletters (i.e., Agents' Subscription Newsletter)
- o ComCom workshops and/or webinars
- o SPK2IR (automated messaging)

Budget

Raising a Purchase Order "PO"

- You'll need to raise a PO and manage any invoices or changes to the PO amount in our Atea finance system (ask a team member to show you this process as you'll need a PhD to work it out on your own!).
- All invoices our suppliers produce need to have the PO number on them before they can be processed and paid.
- Atea can be a complex system to navigate so if you need help you can also request assistance from our Finance team via our Haukainga – Support Portal - Report a new issue. Select 'Buying (Atea)' as your category and fill in the details from there.
- Current contacts (April 2024) are s 9(2)(a)

Campaign budget spreadsheet

You'll need to track your campaign costs and budget details against a campaign budget spreadsheet. You can look at previous campaigns to get an idea of how to set these up.

Activity codes

Activity codes allows us to track budget spending down to campaign level.

If you need an activity code created for one of your campaigns, you'll need to go to Haukainga -> Atea -> Purchase Requisitions -> then click on 'Create a Support Ticket'. A form will open and you'll need to select 'Buying (Atea)' as the Issue category so the ticket is issued to the correct team. Fill out the rest of the form requesting an activity code for X campaign. Make sure to reference our cost centre s 9(2)(i) and natural account s 9(2)(i) advertising) in the request description.

Data and Direct Marketing

Briefing the data teams

All campaigns will require either direct marketing (emails/letters/SMS) or digital advertising, or both, so you'll need to engage one of the two data teams we work with:

1. Compliance Strategy and Innovation "CSI" and/or
2. Centre for Enterprise Data & Analytics "CEDA".

They'll provide you with the appropriate data to drive the targeting of your campaign, and in the case of CSI, the appropriate outputs. As most of our direct marketing is deployed via our START system, you'll most often be working with the CSI team.

Data requests

To get the data work for the campaign approved, prioritised and a data person assigned you'll need to raise a data request. The detail in this request form gives the Data Prioritisation team enough information about the campaign to weigh it up against other business priorities.

Data briefs

Once your data request is approved and a data person has been assigned to the campaign, you'll need to complete a Data Brief which specifies the audience you're wanting to reach and other key details to drive the relevant outputs.

- If your campaign will be deployed out of our internal START system, you'll need to work with the CSI data team. To brief them you'll need to use the START data brief template
- If your campaign will be deployed by Marketing Impact (our external direct marketing agency), you'll need to work with the CEDA data team. To brief them you'll need to use the CEDA-MI data brief template.
- If you'd like to do targeted advertising using custom audience data, or for voice files to be provided for call lines, make sure to specify this in the data brief.

Timings

All campaign activity should be tracked on our overarching Direct marketing calendar. This calendar tracks key deployment dates and campaign details.

The data teams require a heads up approximately 2 to 2 ½ months in advance of a campaign beginning and a draft data brief a minimum of 6-8 weeks prior to launch. Smaller/simpler campaigns and priority initiatives could be turned around faster.

General Tax Document "GTD" copy docs

We use a GTD copy document template when writing our direct marketing (email/letter) outputs for START. This is so the fields and rules align with the way the START team set up the data in the system. The template is saved here.

When the GTD process doesn't apply

If your direct marketing outputs will be sent via Marketing Impact (and data provided by the CEDA team) do not use the GTD copy doc. You can refer to previous Marketing Impact campaigns to see how the copy docs are written and how the fields and rules work.

Text message copy + data

Some campaigns require text messages as part of the direct marketing strategy. Most of our campaigns will be deployed via our START system. In the data brief you'll detail the segments, text message copy and deployment timeframes. Your CSI analyst will create the data query and phase the campaign directly out of START.

The character count for text messages is 160 characters. We have strict requirements for text messages. Here are our current SMS guidelines.

The Voice and SMS team can also be contacted for advice at s 18(c)(i)

Voice data

For some campaigns, we may want to prioritise campaigned customers so that when they call through, they're either moved up the call queue or played a pre-recorded hold message that encourages them to self-service online.

You can request voice file data within your data brief.

Digital file data

We can hyper-target customers on approved digital channels:

- META (Facebook and LinkedIn),
- LinkedIn and
- Google.

To do this we need to request digital files to upload as custom audiences. There are strict file requirements for each channel. The latest file requirements are kept up to date in our data brief templates.

Remember to include custom audience data requirements in the data brief.

Business check data

The business is required to do data checks to ensure there are no issues with the select i.e. customers included that shouldn't be. You'll need to give your business stakeholders a heads up that business checks are required.

Stakeholder engagement

External stakeholders

Some campaigns, for example those driven by new policy initiatives; will require stakeholder engagement with other government agencies and third-party organisations. It's important to link in with Community Compliance, External Relationships and Kaitakawaenga Māori to understand what work they may be doing in the engagement space and whether there are any assets we can share with them to help spread the word through their networks.

External Relationships have a dedicated site and engagement tool He Tūhonotanga that has a directory of active relationships they maintain on behalf of IR. They also maintain a calendar of engagements.

We have a regular catch-up with representatives from these teams to get an idea of what's on their work plan and to share ours.

Consider whether your campaign messaging needs to be shared with stakeholders. If it does, talk to the Marketing Manager and loop in the above teams.

Internal comms for campaigns

To ensure the business has visibility over all key marketing activity you need to create a Te Matawai campaign page and detail the campaign.

You'll also need to request a snapshot update – the Snapshot update is sent out daily at 2pm to our people and directs them to the Te Matawai campaign page to read more about the campaign. The Snapshot update needs to be published out to staff on the first day of your campaign.

Some campaigns may justify a 'Featured News' article on the Haukainga homepage. If you feel like the campaign will be of particular interest, discuss this with the Marketing Manager and if approved, brief in the Internal Comms team who will pull something together.

Web content – campaign pages or permanent pages

All marketing campaigns direct customers to the website (a campaign landing page or permanent page) for more information.

Service Now web content request

You'll need to raise a SNOW request (web request form) for website content to be added or updated. This process is the same regardless of whether you're asking for a new campaign page to be added, or permanent content to be updated.

Someone from the Writing and Web Content Design team will be in touch with a draft page link once the request has been processed. From there you'll refine the content further and then approve.

Campaign page dashboard

To keep across web analytics please get in touch with the Digital Product Experience team (Wei) to set up a campaign dashboard. This will give you a running snapshot of traffic referred to the website via the campaign.

Short URLs

Make sure you think of a short URL for the web landing page you're directing customers too. We tend to have long destination URLs so having short URLs makes it easier for customers to recall our campaign.

Social media

IR currently has approved social media accounts on the following channels:

- Facebook
- LinkedIn (both a company page and showcase page for tax professionals).
- Twitter (a media page managed by our Media team)
- YouTube
- Advertising capabilities on Instagram (using the Facebook advertising extension)
- Advertising capabilities on TikTok*
- Advertising capabilities on Snapchat*

The use of these channels are by manager's approval only

If your campaign includes social, whether that's posts, ads or a bit of both, here is a rundown of the process to make that happen.

Social media brief

If the social media aspect of your advertising is being run in-house you'll need to fill out the social media brief template and send it through to one of the social media reps. They'll review it, add additional ideas/details and confirm what assets they need from you/the agency.

It's important to supply this to the social media team in the campaign planning stage so they can confirm they have the resource to manage the campaign, and so you have asset requirements ready for the advertising agency early on.

Who to contact:

The social media team lead.

Monthly content calendar

Monthly non-campaign content is created by the social media team. This covers core content pillars including:

- Deadlines and dates
- Top tips – Individuals, Business, Families, Student loans etc
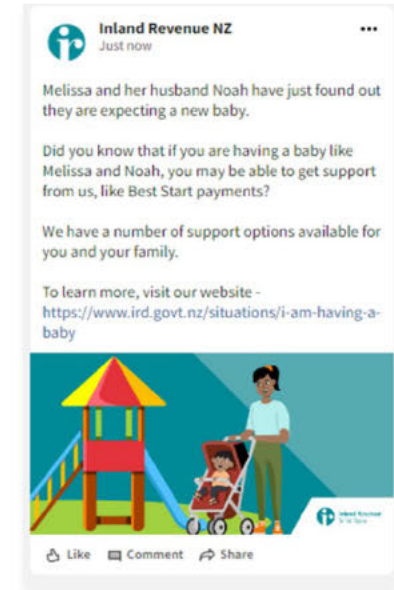
- Cross agency content
- Diversity and inclusion
- myIR handy hints

The Marketing Manager reviews and approves each month's content.

Any ad content, including campaign ad content, is run past the Tax Counsel Office (current contact: Tax Specialist s 9(2)(a) to ensure it meets privacy and legal requirements. The social team will complete this step on behalf of the campaign lead.

The social media team reps then load up the content into Hootsuite or the bank-end of each platform. And a final peer review by the social media lead is completed.

Day-to-day social media management tasks are detailed in this doc: Social media – who what when.

Social media/digital file requirements

Digital file requirements are kept up to date in our data brief templates so please refer to those whenever requesting data files for Facebook, LinkedIn and Google.

Facebook, LinkedIn and Google are the channels our Privacy Officer has approved us to use first party data.

Newsletters

MBIE Business.govt.nz newsletter

We contribute content for the monthly Business.govt.nz newsletters owned by MBIE. This newsletter goes out to small-medium businesses and employers. A team member sends a reminder out in advance seeking contributions. The content template is saved here

We recommend filling out the yearly content calendar to ensure MBIE and our business.govt.nz marketing lead have a heads up of what content is coming.

IR Tax agent newsletter

We have a tax agent newsletter subscription service where tax agents can sign up to receive regular tax agent updates and manage what updates they receive based on their preferences.

If you need to communicate key messages from your campaign to the tax agent audience, you can submit a Service Now request. The request will be triaged and prioritised by the Writing and Web Content Design team and reviewed/approved by the tax agent lead from the External Relationships team.

Front Of House "FOH"

We run front-of-house (FOH) slides on TV screens at all our customer service locations around NZ.

These are updated each month by one of our social media reps and a reminder will be emailed to the full marketing team.

If your campaign message(s) are relevant to audiences who traffic our front-of-house offices, make sure to supply a slide. Keep in mind that each slide is up for approx. 30 seconds, so the content needs to be succinct.

Voice – 0800 lines

Voice recordings

For some campaigns we may work with the business to develop voice recordings for specific 0800 lines to play to relevant customers on hold.

We can use these messages to redirect customers and help them self-serve via myIR. For example, at tax return time we'll let customers know they have the option of updating their income details in myIR instead of over the phone.

Voice data files

We can apply voice data files to specific 0800 lines so only campaigned customers hear the abovementioned recordings.

We can also use them to prioritise campaigned customers up the queue.

This is the form to complete when you need a voice message set up on a calling queue or would like a group of customers ringfenced for a campaign:

https://irdnz.service-now.com/esm?id=esm_sc_cat_item&sys_id=b66a009a1be9a9504f08da86b04bcbdd

Post implementation reviews (PIRs)

We complete a PIR for every campaign so we can track ROI, note where we need to make improvements for subsequent campaigns and so we have a one-stop-shop of results we can direct stakeholders towards. You can use the campaign PIR template to complete your reporting.

Other tips for campaigns

- BRAND GUIDELINES – when developing new campaigns or creative material, keep in mind the criteria in our brand style guidelines. If you're working with another government agency or external partner on joint content, make sure they keep our brand guidelines in mind. The 'All of Government' logo(s) should be used on all external outputs (where practical).
- VIDEOS – if you're developing video/videos as part of your campaign, always request a mood board and get this approved before the video asset is made. Once the video is developed it's much harder and more costly to make changes.
- IMAGES – you can purchase images via iStock or similar. Note: agencies cannot share images they've purchased on our behalf via their own iStock account, so we can ask them to help source images but we must purchase these internally, so we have full access rights.
- PEOPLE TALENT – people need to be police and tax checked, even from an image library. To avoid this, you can use overseas images IF they still represent the diversity of New Zealanders and meet the image requirements set out in our brand style guidelines. If you commission a photographer to take images of people for IR campaigns, those people will need to sign talent release forms and agree to be police and tax checked. If you're using people from within IR, you'll need them to sign a talent release form, but they will not need to be tax or police checked as this happens as part of the onboarding process.

Creative specs for design assets

Social media images

1. Facebook
- In-feed image ads/posts: 1200 x 630 (landscape), 630 x 1200 (portrait) or 1200 x 1200(square)
- In-feed video ads: 600 x 315 (landscape) or 600 x 600 (square)
- In-feed carousel ads: 1080 x 1080
- Stories ads: 1080 x 1920
- Format: images – JPG or PNG, videos – MP4 or MOV
- Size: images - 30MB max, videos – 4GB max
- Video length: in-feed ad max – 240mins (though the ideal length on Facebook is 15secs or shorter!), stories ad max – 15 secs

- Stories
    - Video Duration: 1 second to 2 minutes
    - Maximum File Size: 4GB
    - Minimum Width: 500 pixels
    - Aspect Ratio Tolerance: 1%
    - Primary Text: 125 characters
    - Headline: 40 characters
    - Ratio: 9:16
    - Video Captions: Optional, but recommended
    - Video Sound: Optional, but recommended

2. Instagram

- In-feed vertical image ads: 1080 x 1350
- In-feed vertical video ads: 600 x 750
- In-feed carousel ads: 1080 x 1080
- Format: images – JPG or PNG, videos – MP4 or MOV
- Size: images - 30MB max, videos – 4GB max
- Video length: in-feed ad max – 60secs, stories ad max – 15 secs (we can run story videos up to 60 seconds but shorter is better – up to 30 sec max recommended).
- Stories:
    - Video Duration: 1 second to 60 minutes
    - Maximum File Size: 250MB
    - Minimum Width: 500 pixels
    - Aspect Ratio Tolerance: 1%
    - File Type: MP4, MOV or GIF
    - Ratio: 9:16
    - Video Captions: Optional, but recommended
    - Video Sound: Optional, but recommended

3. LinkedIn

- In-feed image ads/posts: 1200 x 627 (landscape) or 627 x 1200 (portrait)

- In-feed video ads: 1080 x 1080
- In-feed carousel ads: 1080 x 1080
- Format: images – JPG or PNG, videos – MP4 or MOV
- Size: images - 5MB max, carousel – 10MB, videos – 200MB max
- Video length: in-feed ad max – 30mins (though the ideal length on LinkedIn is 15secs or shorter!)

4. Twitter
- In-feed image posts: 600 x 1200(portrait) or 1024 x 512 (landscape)
- In-feed video posts: 1200 x 1200
- In-feed carousel ads: 800 x 800
- Format: images – JPG or PNG, videos – MP4, MOV
- Size: images – 3MB, videos – 1GB
- Video length: max 2mins 20secs (though the ideal length on Twitter is 15secs or shorter!)

Email and letter banner images
- Email: 660w x 155h
- Letter: 677w x 142h
- 100kb or less in size
- Letter versions need to be PNG format and 300 dpi

Web homepage carousel banners
- Desktop carousel banner = 1000 x 480
- Mobile carousel banner = 414 x 175
- No more than 4MB in size

Web campaign landing page banners

- Desktop landing page banner = 8000 x 1333
- Mobile landing page banner = 1725 x 730
- No more than 4MB in size

Hootsuite Image Guide

For more detail Hootsuite's Image Guide can be found **here**

Campaign to-do list and estimated timings

See the below table for specifics of each action

Timing	Action	Tick
General		
12-16 weeks from go live	Initiative is on the marketing calendar and agreed with the business. One-pager marketing plan is completed	☐
12 weeks from go-live	Create full marketing plan/campaign brief – liaise with all key stakeholders	☐
12 weeks from go-live	Brief the social media team using the social media campaign brief	
11 weeks from go-live	Create budget spreadsheet for campaign + update campaign forecasting spreadsheet in Teams	☐
10 weeks from go-live	Campaign brief approval	☐
10 weeks from go-live	If campaign is >$150K then get DFA from Minister	☐
10 weeks' notice required before agency chosen	>$100k campaign then requires procurement (RFP) process i.e., multiple agencies to present pitches before agency is chosen	☐
9 weeks from go-live	If relevant, engage Community Compliance, External Relationships and Kaitakawaenga Māori to consider relevant third-party engagement opportunities	☐
7 weeks prior to go-live	Supply campaign details to Workflow team who will complete a business impact assessment (BIA) and supply to Collab Group for approval	☐
Go-live	Third-party stakeholder engagement underway	☐
4 weeks post campaign	Complete post-campaign reporting and circulate to stakeholders	☐
Data + direct marketing		
10 weeks prior to go-live	Raise data ticket in JIRA. If post-campaign reporting is needed, include this in the request	☐
9 weeks prior to go-live	Complete draft data brief and brief in data team. Include draft GTD (eDM/DM) copy and be clear whether digital custom audience files are required (for social media etc) NOTE – for LinkedIn, request a 'contact list' if you want to target individuals. If you want to reach companies via LinkedIn you need to ask for the 'company list'.	☐
8 weeks prior to go-live	START direct marketing calendar updated with dates, JIRA # etc	☐
8 weeks prior to go-live	Final version of data brief to data team	☐
8 weeks prior to go-live	Draft eDM/DM copy provided to stakeholders and approved	☐
7 weeks prior to go-live	Initial population data provided	☐

6 weeks prior to go-live	Final eDM/DM copy provided to data team in GTD template, including eDM/DM banner artwork provided by advertising agency	☐
5 weeks prior to go-live	Data team provide business check data files and eDM/DM proofs for review	☐
4 weeks prior to go-live	eDM/DM proofs reviewed and business checks completed by stakeholders	☐
3 weeks prior to go-live	Data team provide final eDM/DM proofs for approval	☐
2 weeks prior to go-live	eDM/DM proofs approved	☐
2 weeks prior to go-live	Data team provide digital files (and voice files if required). Social media team load to channels and share with agencies. Voice files supplied to Voice & SMS team	☐
1 week prior to go-live	Data team finalise text message files, double check copy and confirm phasing	☐
1 week prior to go-live	Supply eDM/DM proofs to the Phishing team and the signatory as an FYI	☐
Go-live	Direct marketing components start deploying	☐
Advertising		
12 weeks prior to go-live	Brief in agency/agencies by sending them a creative brief	☐
11 weeks prior to go-live	Meet with agency to go through the brief face-to-face	☐
11 weeks from go-live	If the agency/agencies you're working with are new, set them up as a new supplier. Contact Procurement and Finance to set them up in Atea	
9 weeks prior to go-live	Agency return concepts and estimates	☐
9 weeks prior to go-live	Peer review concepts and high-level media recommendations with Marketing Manager and team member	☐
9 weeks prior to go-live	If social media advertising is being run in-house, touch base with social media lead to check resourcing. Complete social media brief template and supply to social team	☐
8 weeks prior to go-live	Social media team to reverse-brief with any questions and provide requirements and specs for agency	☐
8 weeks prior to go-live	Send successful agency an ASO to sign (or DSO if a design agency). Send Marketing Manager CCN to sign (internal only)	☐
8 weeks prior to go-live	Raise a purchase order in Atea based on the estimate. Attach ASO/DSO and CCN.	☐
7 weeks prior to go-live	Revised concepts and high-level media recommendations provided	☐
7 weeks prior to go-live	Share final concepts with product owner and/or technical leads	☐
4 weeks prior to go live	Draft production assets and detailed media schedule provided for review	☐
2 weeks prior to go live	Final production assets and detailed media schedule provided for approval	☐
Go-live	Advertising in-market	☐

4 weeks post campaign	Close off all POs	☐
Internal comms + IR channels		
6 weeks prior to go-live	Web copy supplied to stakeholders' review (could be campaign landing page or permanent page update)	☐
4 weeks prior to go-live	Web copy approved, Service Now (SNOW) ticket raised with the Content team – this request needs to include any assets, like the campaign banner image	☐
Month prior to go-live	Create FOH slide and submit to marketing rep	☐
Month prior to go-live	Create script for SPK2IR phone line 'hold' messaging and supply to Voice & SMS team	☐
Month prior to go-live	If campaign is SME or employer-focused, create and supply marketing rep with article content for the business.govt.nz e-newsletter	☐
Month prior to go-live	If campaign is contacting clients of tax agents, or tax agents themselves, create and supply tax agent leads with article content for tax agent e-subscription newsletter. Once approved supply raise a SNOW request and include the article detail	☐
2 weeks prior to go-live	Create Te Matawai campaign page which includes examples of the eDM/DM and advertising creative	☐
1 week prior to go-live	Create and submit Snapshot article	☐
1 week prior to go-live	Engage internal comms if a Featured News story for the campaign is required	☐
Go-live	Web landing page, FOH slide, Snapshot, Te Matawai campaign page and Featured News story live	☐

Loading custom audience lists in Meta Business Manager

Before you start, you will have been emailed a link to Sharepoint with the data files. These should be in CSV format. You can download directly from Sharepoint. If sent via email, save to your desktop.

From ads manager, choose Audiences

Click on create Audience and choose Custom Audience

Choose custom list

This page outlines what you need your custom list to look like/include – For your info only. Data team should be fully aware of what is required. IF they don't you can "download file template" – halfway down the page, middle grey box.
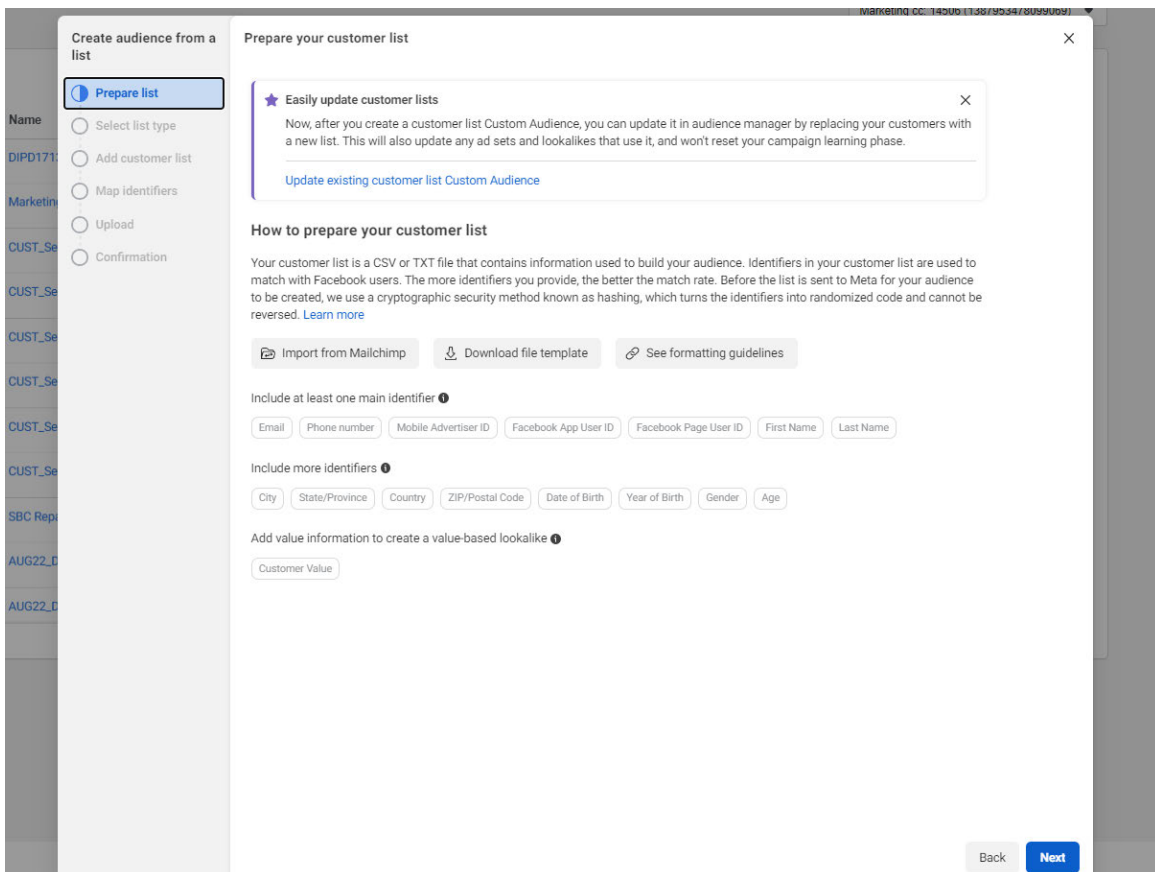
Does your list include a column for customer value? Answer: NO

Choose Upload File. Choose the Facebook data file you downloaded earlier (Facebook lists will be formatted differently to LinkedIn or Google lists). Naming convention example: CUST_Mar23__SLOBB_COM.csv for monthly lists. No need to add a description if your file name is clear.
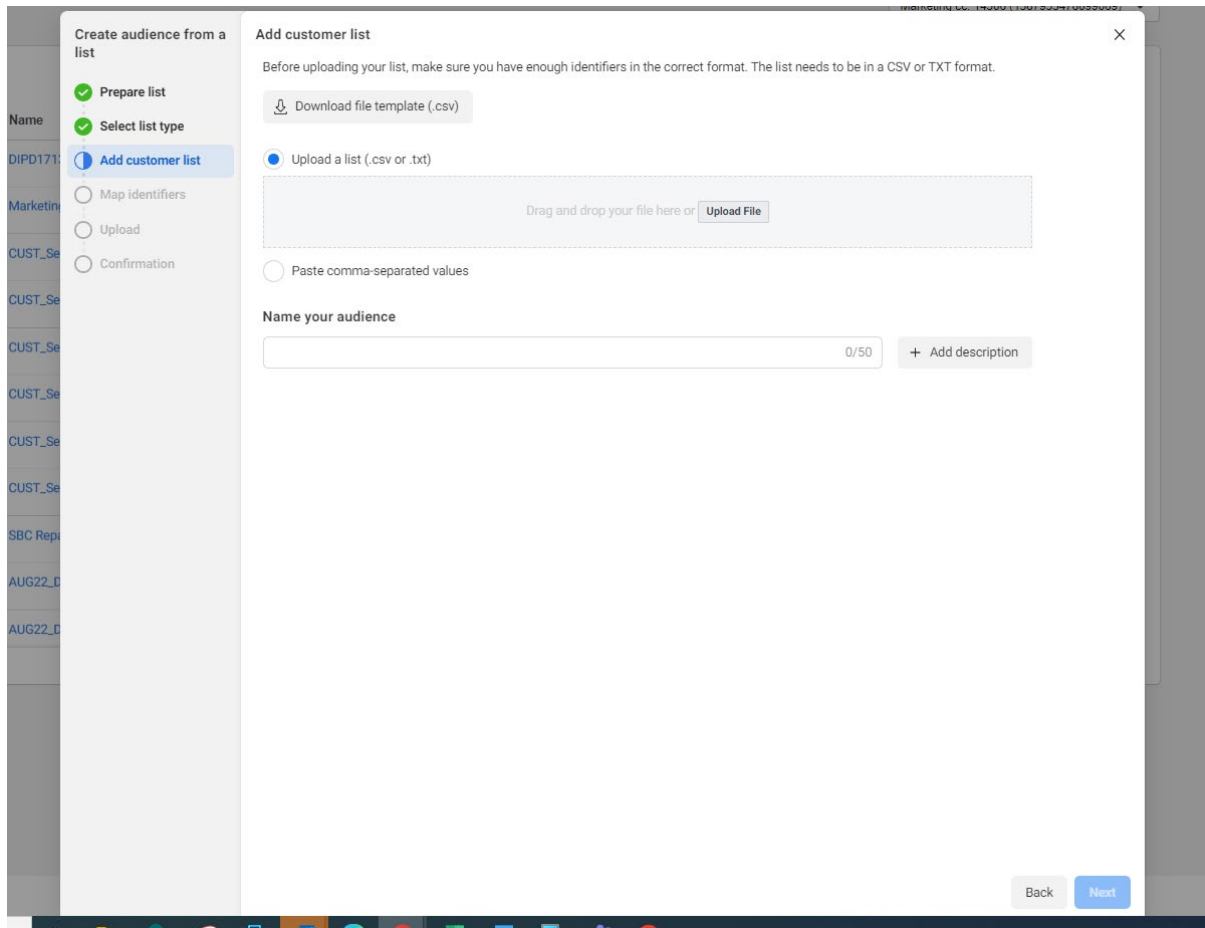
You'll see mapped columns and Action needed. If there is action needed, click on that column. If columns here appear empty in the test run, toggle over to "do not use". We want as clean a file set as possible balanced with as many columns (with good data) as we can to improve match rate.

s 18(c)(i)

Once reviewed, hit Import and create. Then you wait. This is a task that you can do in the background. Larger lists will take longer to load (a few minutes). If it takes longer that 15 minutes, there is probably something wrong. Cancel and start again.

Once the list is uploaded it will tell you the number of rows (it should be 100%). The customer list has been hashed and uploaded but takes up to 24 hours to full match with Facebook data. At this stage you can upload other custom audience lists if you have them "Create another custom list".

Schedule 1: Data Meshing Specifications

<u>Hashing IR customer Data:</u>

IR may provide directly to Online Service Providers engaged by the Provider for a Campaign, encrypted (hashed), anonymised, IR customer data which will be matched by the Online Service Provider with the Online Service Provider's hashed client data (Data Meshing) in accordance with the specifications below for each approved Online Service Providers.

The IR customer data that may be hashed, anonymised, and then provided by IR to an Online Service Provider for Data Meshing is limited to the IR customer's:

1)   name;
2)   date of birth;
3)   address;
4)   email address; and
5)   mobile phone number(s).

Hashing of IR customer data must occur on IR's systems before it is securely sent in hashed form by IR to an Online Service Provider.

IR will **not** provide IR customer data in any form (hashed or unhashed) to the Provider.

<u>Facebook:</u>

IR's customer list is first hashed by IR then uploaded to Facebook by the IR Marketing Team. There, it is matched by Facebook against Facebook's existing list of users' hashed IDs and the matches are added to the 'custom audience'. The custom audience is then shared with the Provider who cannot reverse the hashed list, but can allocate the advertising budget and target ads to specific customers. Here's how it works:

1)   Facebook hashes their data. IR uploads its customer list and it is hashed locally in browser before it is uploaded to Facebook.
2)   After IR's hashed data is uploaded to Facebook, it is matched against the Facebook hashed data.
3)   The matches are added to a custom audience for IR, which can be shared with the Provider.
4)   The matched and unmatched hashes are then deleted.

For more information: https://www.facebook.com/business/help/112061095610075
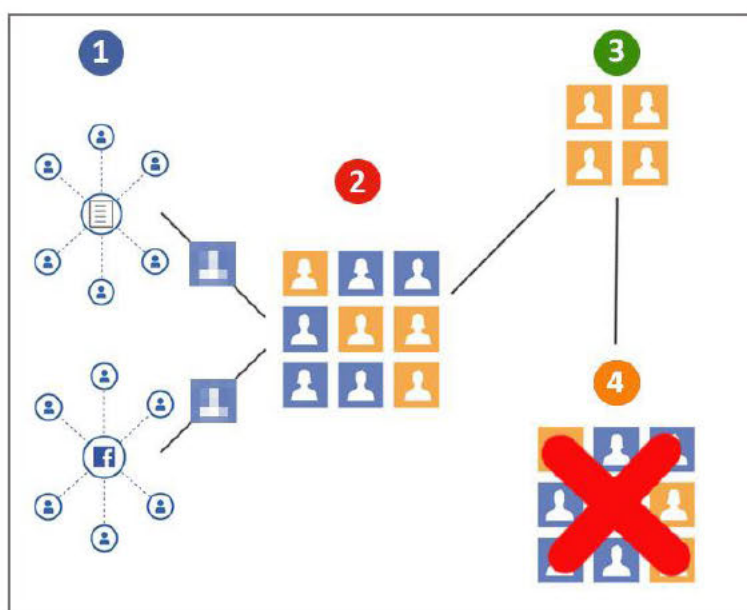
Google - Gmail/YouTube/Search

IR's customer list is hashed and uploaded to IR's Google Ads account by IR. An audience list is created which consists of matches between the customer list and an existing list of Google users hashed IDs. IR then share the audience list ID or name with the Provider who cannot reverse the hashed list, but can allocate the advertising budget and target ads to specific lists.

1) Google hashes their data. IR uploads the customer list and it is hashed locally in browser before it is uploaded to Google.
2) After IR's hashed data is uploaded to Google, it is matched against the Googles hashed data.
3) The matches are added to a custom audience for IR, which can be shared with the Provider.
4) The matched and unmatched hashes are then deleted.

-1-	-2-	-3-
You upload a data file of email addresses your customers have given you.	You create or update a campaign to target your Customer Match audience — customers from your uploaded data file who are Google users.	When those users are signed in to their Google account, they see your ads as they use Google Search, YouTube, and Gmail.

For more information: https://support.google.com/adwords/answer/6334160
Customer Match Policy: https://support.google.com/adwordspolicy/answer/6299717
Data Collection & Use Policy: https://support.google.com/adwordspolicy/answer/6008942

LinkedIn:

IR's customer list is first hashed by IR then uploaded to LinkedIn by the IR Marketing Team. There, it is matched by LinkedIn against F LinkedIn's existing list of users' hashed IDs and the matches are added to the 'custom audience'. The custom audience is then shared with the Provider who cannot reverse the hashed list but can allocate the advertising budget and target ads to specific customers. Here's how it works:

1) LinkedIn hashes their data. IR uploads its customer list and it is hashed locally in browser before it is uploaded to LinkedIn.
2) After IR's hashed data is uploaded to LinkedIn, it is matched against the LinkedIn hashed data.
3) The matches are added to a custom audience for IR, which can be shared with the Provider.
4) The matched and unmatched hashes are then deleted.
5) The provider must request access to IR's LinkedIn Campaign Manager Account which IR must approve
6) The provider can then set up ads with the agreed media budget which is subject to change. Approvals of any artwork are in accordance with the 'Basis of Engagement'.

For more information: https://www.linkedin.com/help/lms/answer/81195/data-collection-and-storage-for-linkedin-matched-audiences?lang=en

Appendix B: Meta Support confirmation email

Hi s 9(2)(a)

Thanks for your response.

Yes. Please be informed that once the case was closed, we do not have an access on that files, same goes with the relevant team that investigated and worked on your issue on that case.

We hope this information clarifies your concern. We will keep this case open for your review or any further concern from your end. Please also note that this case will be closed automatically by our system after 48 hours.

In the meantime, should you have any queries please do not hesitate to get back to us.

Kind regards,

s 9(2)(a)

Meta Pro Team | To learn more on how to serve and build your community with Meta visit: https://www.facebook.com/government-nonprofits