

OIA-CE-2024-02581

15 October 2024

9(2)(a)

Tēnā koe 9(2)(a)

Thank you for your email, received on 21 September 2024, to Oranga Tamariki—Ministry for Children (Oranga Tamariki) requesting information on social media advertising by Oranga Tamariki. Your request has been considered under the Official Information Act 1982 (the Act).

I have responded to each of your requests below.

Does Oranga Tamariki pay for advertising services on the Facebook, Instagram, LinkedIn, Google, Tik Tok or other digital platform?

Oranga Tamariki has paid for advertising on Facebook, Instagram, and LinkedIn.

If so, how much money has been spent, by year, on advertising on each of these platforms?

Please note that information for the social media advertising expenditure for the 2020/21 and 2021/22 financial years is publicly available in response to a Written Parliamentary Question [here](#). As such, this part of your request is refused under section 18(d) of the Act, on the grounds that the information is publicly available.

As noted in the response to this question, information from the period prior to the 2020/21 financial year is not available, as Oranga Tamariki advertising costs were not separated by channel before this time. To provide separate costings would require significant manual collation and resource and would take staff away from operational priorities. As such, this part of your request is refused under section 18(f) of the Act.

The table below outlines the amount spent on advertising on Meta (Facebook and Instagram), broken down by financial year.

Financial year	Amount spent
2022/23	\$10,902.17
2023/24	\$2,682.09
2024/25 (year to date)	\$804.73

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The table below outlines the amount spent on advertising on LinkedIn, broken down by financial year.

Financial year	Amount spent
2020/21	\$42,431
2021/22	\$49,575
2022/23	\$78,724
2023/24	\$91,443
2024/25 (year to date)	\$0

Does Oranga Tamariki use any agencies to place or manage that advertising, if so who?

If Oranga Tamariki uses any agencies to place or manage that advertising, what is are) the names of each of those agencies?

Our Talent Acquisition team has previously worked with Haines Attract for advertising campaigns on LinkedIn for specific campaigns, but not on an ongoing basis.

If Oranga Tamariki uses any agencies to place or manage that advertising, please provide copies of any and all legal agreements between that advertising agency and Oranga Tamariki.

We have been unable to locate a business-as-usual (BAU) contract agreement between Oranga Tamariki and Haines Attract – as such, this part of your request is refused under section 18(e) of the Act, on the grounds that the document alleged to contain the information requested does not exist or, despite reasonable efforts to locate it, cannot be found.

An agreement document between Oranga Tamariki and Haines Attract for a specific youth worker recruitment campaign has been located, but is considered commercially sensitive and, as such, is withheld in full under section 9(2)(i) of the Act.

If Oranga Tamariki uses advertising services on digital platforms as above, does (or has) the agency created "custom audience" lists as part of those campaigns?

If so, please provide a list of the custom lists that have been generated, including the number of people on that list and what market segmentation was being targeted by that campaign and the date for which each custom audience was generated, along with when these audience lists were uploaded and to which platform?

If so, what privacy analysis was conducted prior to custom audience lists being generated?

If so, was the Minister responsible ever made aware that Oranga Tamariki was undertaking this activity? If so, which Minister was it, and when were they notified?

If so, what advice was sought prior to this activity taking place?

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If so, what lawful basis does Oranga Tamariki rely on for this disclosure?

If so, what was the origin of the information that was included in these custom audience lists?

If so, did Oranga Tamariki receive any specific advice as to the efficacy of the security measures around these lists, if so, who provided this advice and when was it provided? Please provide copies of the advice provided.

If so, what security measures are used to protect the privacy of individuals?

If so, is Oranga Tamariki still generating and uploading custom audiences, or is this practice "on hold". If it is on hold, when and why was it put on hold?

If so, can people "opt-out" of being included in these custom audience lists, and if so, how many people have done so?

If so, has Oranga Tamariki received any complaints about this practice, if so, when was the complaint received? Please provide copies of the complaints and any responses.

If so, did Oranga Tamariki consult with the office of the Privacy Commissioner on this practice? If so, when?

If so, has Oranga Tamariki received any reports about the effectiveness of custom audience lists? If so, please provide these.

If so, for each upload of the custom audience lists to each platform, what percentage of these were "matched" against the current users of each platform?

I have interpreted "custom audience lists" to refer to lists of specific individuals for the purposes of advertising. Oranga Tamariki does not use such lists when preparing social media advertising and has not prepared any such lists for this purpose. As such, this part of your request is refused under section 18(g)(i), on the grounds that that the information requested is not held by Oranga Tamariki, and the person dealing with the request has no grounds for believing that the information is held by another department.

Social media advertising by Oranga Tamariki may utilise general demographic information (such as age, gender, or location) in order to target relevant demographic groups for advertising purposes. However, this does not constitute a custom audience list per the above interpretation.

Any information used for demographic targeting for advertisements is information that is made available to the social media platform as part of their terms of use. As such, the end user inherently consents to their information being made available this way as a condition for use of the site, and so the responsibility for privacy, security, and proper use considerations for this information lies with Meta as the company responsible for Facebook and Instagram.

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Postings made on LinkedIn do not use demographic information to advertise. Standard basic fields such as location, employment type, industry, and job function are required to post the listing. Users of the platform may have specific saved searches or notifications enabled for their jobs in these categories, but demographic information does not inform advertisement of such listings.

As Oranga Tamariki has not used custom audience lists per this interpretation, we have not received any complaints on this matter.

Has any person from Oranga Tamariki had any meetings, whether in person, by videoconference or other method, with any representative from Meta, Google, LinkedIn, Tik Tok, or any other digital advertising platform in the last 12 months?

If so, who was present during these meetings?

The Oranga Tamariki Talent Acquisition team have met with a representative from LinkedIn to discuss contract renewal in August 2024.

This meeting was attended by Carly Drury (Director Talent Acquisition – Oranga Tamariki), Liam O’Sullivan (Senior Talent Partner – Oranga Tamariki) and a representative from LinkedIn.

We are unable to name the representative from LinkedIn for privacy reasons. As such, this part of your request is refused under section 9(2)(a) of the Act, to protect the privacy of natural persons.

No other meetings with social media representatives have been held within the past 12 months.

If so, please provide the agenda, notes, minutes and any communications associated with these meetings.

No formal agenda or minutes were created for this meeting. The correspondence related to setting up this meeting has been withheld in full under section 9(2)(b)(ii) of the Act, to protect information where the making available of the information would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information.

Does Oranga Tamariki have a dedicated account manager with Meta, Google, LinkedIn, Tok Tok or any other digital advertising platform. If so, what is the name of this person or the names of these people?

Oranga Tamariki has an account manager with LinkedIn. However, as noted above, we are unable to share this person’s name. As such, this part of your request is refused under section 9(2)(a) of the Act.

Oranga Tamariki does not have an account manager with any other social media platforms. There is an Australasian representative for Meta that may be contacted for reasons such as taking down posts in breach of New Zealand privacy laws – however, this representative does not fulfil the role of an account manager.

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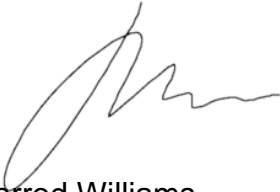
Please provide any correspondence, e-mail, document, or record held by Oranga Tamariki on the subject of custom audience lists, advertising on Meta, Face book, Instagram, Google, Tik Tok or any other platform for the period 1 September 2024 and today.

As Oranga Tamariki does not use custom audience lists per the interpretation above, this part of your request is refused under section 18(e), as the document alleged to contain the information requested does not exist.

Oranga Tamariki may make the information contained in this letter available to the public by publishing this on our website with your personal details removed.

I trust you find this information useful. Should you have any concerns with this response, I would encourage you to raise them with Oranga Tamariki. Alternatively, you are advised of your right to also raise any concerns with the Office of the Ombudsman. Information about this is available at www.ombudsman.parliament.nz or by contacting them on 0800 802 602.

Nāku noa, nā



Jarrod Williams

**Acting General Manager Public Information and Ministerial Services
System Leadership**