

From: Jenny Lapham
To: [REDACTED]
Subject: FW: LGOIMA regarding the Rippl App
Date: Tuesday, 30 June 2020 01:28:00 p.m.
Attachments: [image001.png](#)
[Information_Redacted.pdf](#)

Dear [REDACTED]

I refer to your request for information relating to the Rippl App Tracing system. Please accept my apologies for the delay in replying to your request.

Attached for your information is a copy of the assessment form. Please note that we have withheld some information that pursuant to section 7(2)(b)(ii) of LGOIMA would be likely unreasonably to prejudice the commercial position of person who is the subject of the information and section 7(2)(f)(i) of LGOIMA to maintain the effective conduct of public affairs through the free and frank expression of opinions by or between or to members or officers or employees of any local authority.

As we have withheld some information you are advised that you have the right to seek a review of this decision by the Office of the Ombudsman. Information on how to make a complaint is available at www.ombudsman.parliament.nz or freephone on 0800 802 602.

Regards

Jennifer Lapham

Governance Support Officer
Civic

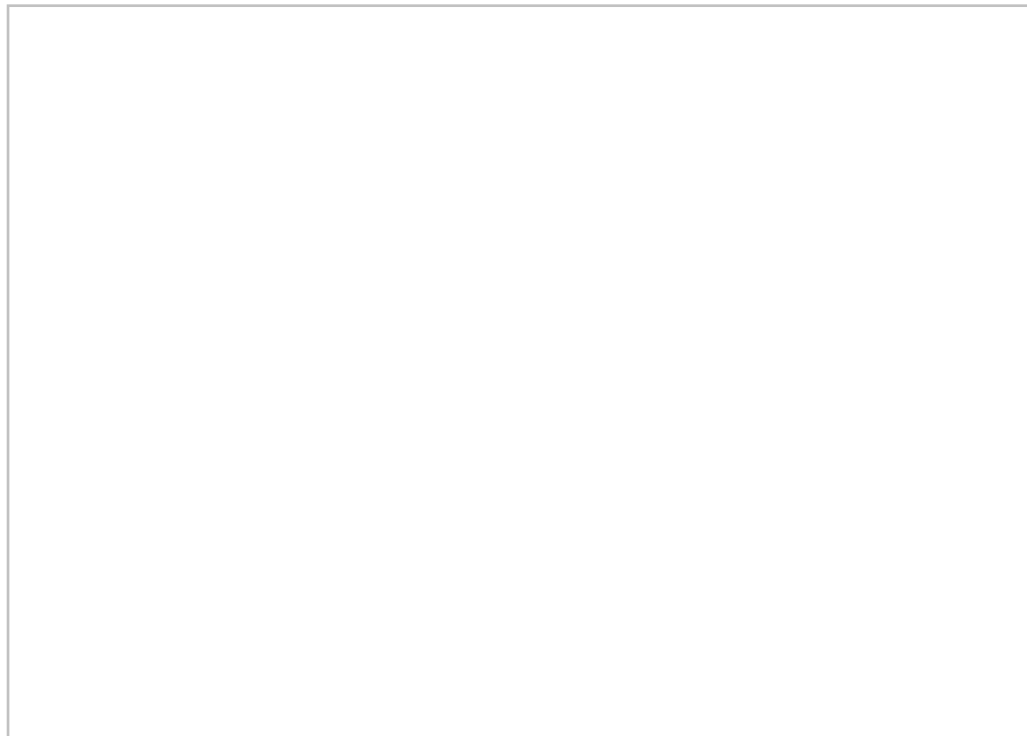
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Covid-19 Tracing App Assessment

Principle	Criteria
Whole of City – A solution should be designed for hospitality/small businesses and work for Council, Council Controlled Organizations and other Providers	<ul style="list-style-type: none"> - Can this solution be used and afforded by a Café seating 25 people under “ordinary” circumstances? - Can this solution be used in a jewelry shop? - Can this solution be used at a swimming pool, a library and a community center? - Can this solution be used at the Art Gallery and the Museums? - Can this solution be used at a non-ticketed event holding 100 people or fewer? - Is the solution made and supported in New Zealand?
Contactless - a solution should reinforce a physically contactless interaction to protect staff and other visitors	<ul style="list-style-type: none"> - Does this solution require any physical contact with an object? - Can a staff member see if the check-in has been successful?
Designed for Privacy – a solution should have privacy as a core design driver and pass a privacy impact assessment	<ul style="list-style-type: none"> - Does the company make statements about the place of privacy in its design statements? - Do the conditions of use clearly outline how the data is collected, stored, used and collected? - Is there any contractual recourse if there is a data breach? - Is there a high chance that the solution will pass a privacy impact assessment from the material obtained? - Are there safeguards in place against the information being amalgamated into marketing lists or other types of registers? - Is the data held in a complying jurisdiction for public service customers?
OS Agnostic and Standards Compliant – A solution needs to support both Android and Apple Operating Systems (and preferably a text option) and also comply with the emerging health ministry guidance on standards for CoVID contact tracing data collection.	<ul style="list-style-type: none"> - Does the solution work on both apple and android cellphones? - Is there any other interface for non-smart phones? - Is there evidence of working with Health Authorities or the Government Chief Digital Officer (GCDO – Internal Affairs)

	<ul style="list-style-type: none"> - Is the evidence of engagement with the Office of the Privacy Commissioner?
Minimal – A solution should be “light” minimizing memory and battery use and transparent in the way it works.	<ul style="list-style-type: none"> - Does the solution use high drain services such as geotracking? - Is there a clear statement on how the solution works for both end users and premises?
Sustainable – A solution should be able to be sustained at all alert levels which require tracing, be commercially sustainable and have a support model for twelve months.	<ul style="list-style-type: none"> - Is there a business model which offers support for twelve months? - Is the solution sustainable through to the conclusion of level 1?
Safe – A solution should give users the primary control over their data and how it is used.	<ul style="list-style-type: none"> - Does the user have control of the data? - Is there a relationship between the user and the Ministry/Regional Health Contact Tracers? - Are there industry standard digital security and safeguards around the data throughout the chain from collection to destruction?

Solution Options

The COVID-19 tracing industry is rapidly expanding, with new options being brought to market daily. A market scan was conducted during the week of 27 April 2020. This scan looked at what was available and from it three options were selected for assessment. These are:

Rippl - Rippl is a COVID tracing solution produced by PaperKite in Wellington. It is an app-based system which has been developed for the hospitality industry.

██████████ is a COVID tracing solution produced by ██████████. It is a web app developed for general use.

██████████ is a COVID tracing solution produced by ██████████. It is an app-based system in use by ██████████.

These solutions are evaluated in the table attached. All of these solutions are serviceable and are services that can be recommended for implementation. The evaluated scores were:

Rippl – 52 points

RIPPL had the best demonstrated relationship between a person and the Health Authorities. It rated highly for:

- Enabling direct interaction between health authorities and users
- A clear demonstrated commitment to Privacy, Data remaining with users and Co-Design
- A business model that included support, that was sustainable and geared to the hospitality sector
- Being Locally produced and with an executable development plan

RIPPL also had a commitment to ensuring that data could be encoded on the phone to prevent potential domestic violence or loss of privacy from physical security breaches

██████████ - 46 points

██████████ rated second. ██████████ rated highly for

- Providing a clear interaction between health authorities, users and facilities owners
- A clear, demonstrated commitment to Privacy
- A business model that included support, was sustainable and accessible to small business

██████████ rated less strongly in that it was based in ██████████ and did not have a clear development plan.

██████████ – 42 points

██████████ rated third. ██████████ rated highly for:

- Being a simple, web-based solution that was scalable across businesses and city attractions
- Being transparent, serviceable for Public Health Tracers and facilities managers
- A clearly stated commitment to privacy
- Being locally produced

██████████ did not rate as strongly for a development plan, business model and support model. The system also did not have the personal control of data or as stronger privacy protections as the other options.

Criteria	Weighting	Rippl	██████████	██████████	comment
Whole of City					
Can this solution be used and afforded by a Café seating 25 people under “ordinary” circumstances?	/3	2	3	3	██████████ are free to businesses so rate higher
Can this solution be used and afforded in a small shop?	/3	2	3	3	██████████ are free to businesses so rate higher
Can this solution be used at a swimming pool, a library and a community center?	/3	3	3	3	All are suitable
Can this solution be used at the Art	/3	3	3	3	All are suitable

Criteria	Weighting	Rippl			Comment
Gallery and the Museums?					
Can this solution be used at a non-ticketed event holding 100 people or fewer?	/1	1	1	1	All can be used this way
Is the solution made and supported in New Zealand?	/2	2	2	0	Both RP & are locally made
Contactless					
Does this solution require any physical contact with a communal object?	0= yes 1= No	1	1	1	All are contactless
Can a staff member see if the check-in has been successful?	0 = yes 1= No	1	1	1	All display a message
Designed for Privacy					
Does the company demonstrate a commitment to Privacy by Design in its statements?	/3	3	3	3	All demonstrate commitment to Digital Privacy best practice (albeit in different ways)
Do the conditions of use clearly outline how the data is collected,	/3	3	3	3	All give statements

Criteria	Weighting	Rippl			Comment
stored, used and collected?					
Is there any contractual recourse if there is a data breach?	/2	2	0	2	With no purchase agreement controls over are not as strong
Is there a high chance that the solution will pass a privacy impact assessment from the material obtained?	0= No 1= Yes with work 2=Yes 3= Yes with additional safeties	3	2	2	All would pass - RIPPL has an inbuilt technological advantage from its storage system.
Are there safeguards in place against the information being amalgamated into marketing lists or other types of registers?	/1	1	0	1	The distributed list system of RIPPL and the encoding system of are strongest
Is the data held in a complying jurisdiction for public service customers?	/1	1	1	1	All comply given the information received
OS Agnostic and Standards Compliant					
Does the solution work on both apple and android cellphones?	/2	2	2	2	All work
Is there any other interface for non-smart phones?	/1	0	0	0	None provide SMS capability

Criteria	Weighting	Rippl	██████	██████████	Comment
Is there evidence of working with Health Authorities or the Government Chief Digital Officer (GCDO – Internal Affairs)	/3	3	2	2	RIPPL have clear engagement with both, █████ and █████ show engagement with Health
Is the evidence of engagement with the Office of the Privacy Commissioner?	/1	1	1	1	All show evidence of using OPC guidance
Minimal					
Does the solution use high drain services such as geotracking?	1 = No	1	1	1	All are based on QR rather than geofence
Is there a clear statement on how the solution works for both end users and premises?	/3	3	3	3	All the end user statements are clear
Sustainable					
Is there a business model which offers support for twelve months?	/3	3	1	3	RIPPL and █████ both have subscription and support models. █████ is free and it is not clear
Is the solution sustainable through to the conclusion of level 1?	/3	3	3	3	All are sustainable (ie they can continue to

Criteria	Weighting	Rippl	██████	██████████	Comment
					function and comply)
Safe					
Does the user have control of the data?	/2	2	0	0	RIPPL keeps the data with the User – █████ & █████ also keep it with Facility
Is there a direct relationship between the user and the Ministry/Regional Health Contact Tracers?	/3	3	1	1	RIPPL showed the strongest process and engagement. The others were serviceable but not demonstrated.
Are there industry standard digital security and safeguards around the data throughout the chain from collection to destruction?	/3	3	2	3	████ requires the Business Owner to destroy the data from their emailed reports.
Totals		52	42	46	