



**10 November 2021**

# **Towards a Digital Strategy for Aotearoa**

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**Submission to the Department of Internal Affairs**

## Introduction

### InternetNZ supports the direction of the digital strategy

1. InternetNZ welcomes the opportunity to submit on [the digital strategy](#).
2. InternetNZ is the home and guardian for the .nz domain, and it's our mission to create an Internet for all New Zealanders that is safe, accessible, and a place for good. As well as operating the .nz registry, we fund research, host community events, and work to inform policy thinking on Internet issues.
3. Over the past two decades, digital technologies have become a part of everyday life. This was brought home, quite literally, during the COVID-19 pandemic when many of us relied on the Internet for remote working and learning, buying essentials, and connecting with friends and family. People who could not take their lives online missed out on these basics.
4. This strategy is a chance for the government to set New Zealand's direction. As well as setting out targets and work programmes to build trust, include everyone, and support beneficial growth, this strategy will plant a flag for New Zealand's approach to a digital future.
5. We encourage the government to be bold in setting the level of ambition, and clear in its commitment to uphold key values as we navigate a digital future.
6. Our submission draws on the recently released World Internet Project 2021 report,<sup>1</sup> offering a view of how New Zealanders participate online and our key concerns, which may be of interest to officials and others.

### Apply the pillars in order: trust, then inclusion, then growth

7. We welcome the framework of mahi tika, mahi tahi, and mahi ake. We see this strategy as a chance to address future challenges and opportunities, not by predicting them, but by clearly stating the values and priorities which will lead New Zealand's response, including where pillars are in tension.
8. One key strategic risk we see in the digital environment is the potential for a loss of trust in institutions. The solution is to proactively build trust.
9. We recommend prioritising the three pillars in the order they are presented, with mahi tika first, mahi tahi second, and these two pillars as the foundation for the third pillar of mahi ake. Starting from trust supports full and dignified

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<sup>1</sup> [https://workresearch.aut.ac.nz/\\_data/assets/pdf\\_file/0007/571129/WIP-2021-Final\\_Nov.pdf](https://workresearch.aut.ac.nz/_data/assets/pdf_file/0007/571129/WIP-2021-Final_Nov.pdf)

inclusion for all New Zealanders. Starting from trust and inclusion means digital growth is more likely to serve sustainable wellbeing for all.

### **Set clear accountability and measure the things that matter**

10. The strategy also needs to be clear on which agencies are accountable for delivery, and to set meaningful measures for the strategic goals in each area.
11. Existing research like the World Internet Project reports might usefully inform measures under the strategy. If there are gaps in research, then resourcing further independent research on digital issues could help with this too.

### **Lead by bringing communities together on digital issues**

12. Across the three pillars of mahi tika, mahi tahi, and mahi ake, we think it will be vital to include communities and work in partnership with them. Government can lead by stating its strategic goals, plans, and measures, but to bring people along it will be important to engage with communities, and commit to resourcing this over the life of the strategy.
13. The most pressing issue in the digital world is people's trust in institutions and each other. We think that treating the mahi tika pillar as foundational to this strategy, and resourcing proactive work to build trust with communities, is an opportunity for the government. Building partnerships with communities is the best way to address trust challenges like misinformation, and lays a foundation for work on inclusion and growth that serves everyone.

# **Consultation questions**

## **Overall**

### **What do you think of the proposed vision, goals, and measures?**

#### **How could these be improved?**

14. **We support the framework of mahi tika, mahi tahi, and mahi ake, but there will sometimes be a need to prioritise.** We recommend prioritising the pillars in the order they are presented, putting trust first and inclusion second, as a foundation for digital growth that serves the wellbeing of everyone.
15. **The mahi tika pillar should address the biggest challenges to digital trust.** We welcome the emphasis on partnering with communities on the ethical use of technology by government, and recognition of cybersecurity concerns, but a key element is missing from this pillar. People's biggest digital trust concerns are about the business models and impacts of large online service providers, and the online spread of harmful behaviours and misinformation. The mahi tika pillar should recognise that these concerns exist, and explain where they sit in the strategy, even as a placeholder for future areas of work.

16. **We welcome the strategy to coordinate and guide future work, but some areas need urgent action that cannot wait.** The most pressing of these areas is digital equity, where meaningful action is needed in the next budget cycle.
17. **Resourcing, real measures, and accountability is critical to support good outcomes.** We would like to see clear agency-level accountability for delivering to the strategy. As proposed, some measures are vague and not well aligned to inputs. Clear accountabilities and measures are important to enable delivery.

## Mahi tika means committing to do what's right

### Q: What do you think about the issues and opportunities for trust?

18. **We see mahi tika as a starting point which is foundational to the strategy.** A digital world creates changes, challenges, and uncertainty. Starting by saying “we will do what’s tika” offers a reassurance about how government will navigate a changing digital future. We think the language of mahi tika is the right framing for this pillar. If government starts by doing what’s tika, its work will earn people’s trust across communities in Aotearoa. We think that approach will best align to outcomes under the living standards framework.
19. **Building trust requires strategic leadership on people’s biggest concerns.** The mahi tika pillar work areas focus on cybersecurity, and do not address other concerns New Zealanders have about digital technologies, such as misuse of personal data by large companies,<sup>2</sup> or the impacts of extremist views, misinformation, and potential harms to children online<sup>3</sup>. We think a broader view of challenges to trust should inform the strategy, while recognising government cannot solve these problems on its own.
20. **We welcome a partnership of government, business, and civil society.** We welcome the recognition that building trust needs to go beyond government and industry, and include communities and civil society. The Internet has no one owner, and so key forums and decisions work on a multistakeholder model. We think New Zealand can learn from and improve on that model.
21. **The right way to build trust starts with engaging communities.** Some of the framing on this pillar emphasises the need for trust with export markets. We think it is more important for government to build trust, understanding, and capacity to engage on digital technologies within communities in Aotearoa. We support consideration of how to engage and build trust with Māori under this pillar. We recommend a broader multistakeholder engagement approach, finding ways to reach and engage people across diverse communities.

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<sup>2</sup> [https://workresearch.aut.ac.nz/\\_data/assets/pdf\\_file/0007/571129/WIP-2021-Final\\_Nov.pdf](https://workresearch.aut.ac.nz/_data/assets/pdf_file/0007/571129/WIP-2021-Final_Nov.pdf)

<sup>3</sup>

<https://internetnz.nz/new-zealands-internet-insights/new-zealands-internet-insights-2020/concerns-and-safety/>

22. **Communities are the best partners on challenges like misinformation.** During the vaccination rollout and the broader COVID-19 pandemic, we have seen increasing challenges from misinformation spread online and offline. The vaccination rollout has also shown how community-based efforts can reach people who do not trust and avoid participating in government institutions.
23. Approaches that empower communities are the best way to build trust and make progress on challenges like misinformation. There is also an opportunity to align this approach to social cohesion work following the Royal Commission into the terrorist attack on Christchurch masjidain, and to learn from that work what approaches are best to engage affected communities.

### **Q: What do you think of the immediate priorities, as outlined?**

24. **We welcome the focus on collaboration to foster trust.** This is an area government can lead on, for example by extending the work of the Digital Council, and expanding on initiatives like the Algorithm Charter from StatsNZ.
25. We think this focus on collaboration with communities should extend to work on cybersecurity, digital safety, and especially digital government. No one person, discipline, or agency has all the information needed to make good decisions about the digital world.
26. We think a focus on better modes of engagement to foster those conversations could be a useful starting point for work on digital government, drawing inspiration from models such as vTaiwan.

### **Q: What might we focus on in the longer term?**

27. Digital technologies can operate to undermine people's trust in each other, or to bolster it. We should not settle for mitigating the harms, but should look further to how government can enable communities to build trust and thrive.
28. New Zealand has the chance to lead on initiatives that resource people in the community to support social cohesion, and to combine our relatively small, local, and responsive government with better digital ways for people to participate in democracy while being confident and staying safe.

## **Mahi tahi means committing to do this together**

### **Q: What do you think about the issues and opportunities for inclusion mahi tahi?**

### **Q: What do you think of the immediate priorities, as outlined?**

### **Q: What else would you propose?**

29. **We think the measure for mahi tahi should be expressed in terms of achieving digital equity in Aotearoa.** The goal is to connect people, not

houses, and it needs to be measured by the level of people's actual participation, including for the most excluded.

30. Last year InternetNZ released the five point plan for digital inclusion, which called for action on five digital inclusion priorities. Following that we began collaborating with people and organisations who all share a commitment towards digital equity in New Zealand towards setting up the [the Digital Equity Coalition Aotearoa](#) (DECA), which we continue to support.
31. We see the role of government as providing leadership and funding, to enable the mahi to be undertaken through networks that have existing relationships and trust in local communities. This aligns with our recommendation to treat mahi tika as foundational to the whole strategy.
32. The government needs to focus on affordable connectivity, getting appropriate devices to people, and digital skills and wrap around support so that people can make the most of the connectivity and devices. This needs to be provided as an holistic package of support, and provided in a way that reaches and meets the needs of those groups who face the greatest digital inclusion barriers. This will involve consideration as to how to utilise existing trusted networks, and how to support options that provide choice and dignity.

### **Consider which framework is right to inform decision making**

33. InternetNZ has been proud to be a part of the conversation around digital inclusion for many years, and we promoted an early version of the motivation, access, skills, trust (MAST) framework in our 2018 paper on digital divides.<sup>4</sup>
34. While we are pleased to see this framework used to better understand the holistic nature of digital equity challenges, and the barriers to overcome, we encourage you to test this model and make sure it is fit for purpose. Our more recent work, including collaboration with the Vodafone Foundation and The Workshop, has added **capacity** as a key barrier and enabler of digital equity.
35. We saw that capacity was the main obstacle most families faced, for example having the time and energy to consider adopting digital technologies. Achieving digital equity under the goal of mahi tahi will require support across a range of capacities delivered by operators who people trust.

### **Building trust with people is foundational for work on inclusion**

36. In our work with DECA, we see a consensus across the sector that dignity, trust, and a mana-enhancing approach are vital to work on digital equity.
37. Increasingly the barriers that stop people fully participating involve trust, safety, and confidence. Government action in this area must be framed in ways that respect people and their ability to make choices. For example, government-supported connectivity for adults should not be limited in what

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<sup>4</sup> [https://internetnz.nz/assets/Archives/Solving\\_Digital\\_Divides.pdf](https://internetnz.nz/assets/Archives/Solving_Digital_Divides.pdf)

people can access compared to a full commercial Internet offering. That type of limitation fails to uphold people's dignity and enable full participation.

38. We comment on measures below, and favour broader measures for mahi tahi that recognise social barriers and are more closely linked to inputs and goals.

## **Mahi ake means growth that serves wellbeing**

### **Q: What do you think about the issues and opportunities for growth?**

39. Digital growth is going to happen one way or another. The key strategic question is how to foster digital growth that delivers sustainable wellbeing for all New Zealanders. We think this is best served by government putting its priority on mahi tika and mahi tahi, so growth does not harm trust or inclusion and is supported by both.
40. Inclusive and diverse participation in digital education, digital skills, and digital work, is still a substantial gap and a significant challenge. This is a challenge for training, but also for recruitment and industry culture, requiring a shift to make people feel welcome whatever their different backgrounds.
41. The focus on selling IP internationally is far too limited. Building and selling intellectual property is only one way to deliver value and succeed in the digital world, with other strategies including moving quickly, building for interoperability, and offering platforms for participation by other people.

### **Q: What do you think of the immediate priorities, as outlined?**

42. Government can best support infrastructure innovation by ensuring the regulated inputs are delivering to their potential.
43. We think a direct focus on 5G may be misplaced. The government supported substantial investments in UFB fibre broadband, and that fibre can now serve as enabling infrastructure for other modes, provided that the speed, quality, and pricing of fibre connections is fair and efficient.

### **Q: How can government and industry best work together to realise the growth potential for New Zealand?**

44. Include community voices in these conversations. We think government, industry, and communities need to work together to help frame growth opportunities and address emerging challenges from digital technologies.
45. We share concerns about the scale, revenues, influence, and impacts of large overseas-based online services which are leading to calls for regulation. We think any regulatory response to these concerns needs to be based on inclusive local conversations, and based on a strategic view of what's good for New Zealanders in the long term. Looking at regulatory approaches

overseas, we see a risk from some proposals of locking in big online services at the expense of potential local competition and innovation.

## **Wider work across all themes**

### **What is happening in your community to help people (community groups and businesses) to be more digitally enabled? Tell us more about how well it has worked and why?**

46. We think engagement on Internet governance is vital to this strategy.
47. We welcome the acknowledgement that, “[a] world class digital nation cannot exist without trustworthy institutions and infrastructure. Maintaining a dependable and well-governed Internet is critical to connecting Aotearoa New Zealand to the world. This requires government, business, and civil society to work together”.
48. Some of the most important conversations and decisions for the health of the Internet take place in international forums on Internet governance. As part of our role and our commitment to New Zealand to manage the .nz ccTLD, InternetNZ participates and works with government agencies in these forums to help ensure that the Internet is developed and managed in a way that makes it free, open and secure. But this work needs more support.
49. In March 2021, we wrote to Chief Executives of DPMC, MFAT and MBIE, calling for a renewed commitment to international engagement on Internet governance and policy. At the time of this submission, in November 2021, we have not yet received a response.
50. We think a commitment to government participation in multistakeholder and multilateral forums on Internet governance is crucial to the success of this strategy. This commitment needs to be matched with adequate and sustained resourcing and cross-agency coordination over time.
51. We are keen to work more with government in this area, and to help ensure Aotearoa has a voice on the Internet’s future.

## **How will we track our progress?**

### **What are your thoughts and comments on the proposed progress indicators? What else would you suggest?**

52. Measures should offer useful information on the inputs and goals. Of the proposed measures, some are vague and do not align to the inputs or goals. Where good information is not available to inform a measure, this might be an opportunity to resource research which would have broader benefits.
53. The pillar of mahi tika should be realigned to focus on trust within local communities in Aotearoa. Measures should relate to this context, and include



independent measures of people's trust in digital activity generally and by government in particular. To mitigate a loss of trust you have to notice it.

54. Proposed measures on mahi tahi focus on access to connections. We think these measures need to be broadened to cover social barriers to digital equity, such as access to training programmes, community support, and the ultimate output of how many people are enabled to fully participate online.
55. Beyond the measures proposed, we think measures on mahi tika and mahi tahi need to include some assessment of deprivation and exclusion. Qualitative measures are an important part of this picture, as they can offer information on why people do not participate fully.

## Conclusion

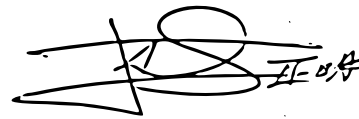
56. Thank you again for the chance to submit on this digital strategy.
57. Please direct any questions or comments to [policy@internetnz.net.nz](mailto:policy@internetnz.net.nz)



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