Public Service Commission
Te Kawa Mataaho

1 October 2026

9(2)(a) privacy

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Official Information Request
Our Ref: OIA 2026-0276

I refer to your Official Information Act 1982 (OIA) request received by the Public Service Commission (the Commission) on 24 August 2026 for:

1. *A copy of the KPMG cost-of-compliance assessment and EY findings referred to in the March status report.*
2. *The names of the four TaaS suppliers that initially refused to sign the transition CAA. Please clarify whether the four have subsequently signed as of the time of writing. I note that, regarding s 9(2)(b)(ii), there is a public-interest argument for this information being released now that the negotiations are historical.*
3. *Was the Commercial Principal Advisor position referred to in the C3 risk register ultimately backfilled? If so, on what date?*
4. *How long was the programme without that capability?*
5. *Did the loss of the role cause or contribute to the movement of any C3 milestone or supplier-onboarding date?*
6. *What FSP Phase 2 saving was attributable to disestablishing that position?*
7. *Which MBIE project is Risk 1 (page 12) referring to, and did any of its milestones slip?*
8. *What activities or staffing will absorb the GDDA's $603,000 Budget 2026 baseline reduction?*
9. *Please clarify the CISO "silence as acceptance" entry: what is meant by the statement that “No responses were received and reliance placed exclusively on ‘Silence as acceptance’”?*
10. *Which agency CISOs were asked to provide written endorsement of the CMA Part 2 security provisions?*
11. *Have written endorsements from agencies subsequently been obtained as of the time of writing, if so; from which agencies on which dates?*
12. *On what authority or decision was non-response treated as endorsement?*
13. *Please provide a copy of any document that records the Deputy Secretary's final approval/sign-off for any Provisional and/ or Final CMA Part 2 Terms.*

On 1 September 2026, part six of your request was transferred to the Department of Internal Affairs (DIA) under section 14 of the OIA, as the information sought is connected to the functions of DIA.

On 1 September 2026, you clarified part eight of your request to the following:

> *"For part eight, I am seeking what decisions or measures have been, or are expected to be, taken to accommodate the GDDA's $603,000 annual baseline reduction from 2026/27. This includes, where applicable:*
>
> - *staffing or FTE reductions;*
> - *positions or vacancies not filled;*
> - *reductions in contractors or consultants;*
> - *activities, programmes, services or projects stopped, reduced or deferred; and*
> - *any other savings or efficiency measures being used to meet the reduction.*
>
> *If no particular activities or staffing have been affected, I would appreciate an explanation of how the reduction is instead being absorbed".*

Information being released – parts three to five and seven to thirteen

For ease of reference, I have listed each of your requests and our responses directly underneath.

3. *Was the Commercial Principal Advisor position referred to in the C3 risk register ultimately backfilled? If so, on what date?*

The Commercial Principal Advisor position referred to in the C3 Modernisation Programme Risk Register was not backfilled.

4. *How long was the programme without that capability?*

The Commercial Principal Advisor position concluded on 30 November 2025. All remaining work was managed by the existing team.

5. *Did the loss of the role cause or contribute to the movement of any C3 milestone or supplier-onboarding date?*

The disestablishment of the Commercial Principal Advisor position did not cause or contribute to the movement of any C3 Modernisation Programme milestone or supplier onboarding dates.

7. *Which MBIE project is Risk 1 (page 12) referring to, and did any of its milestones slip?*

The project referred to in the C3 Modernisation Programme Status Report was the ProcureConnect Platform Project. DIA was initially looking to move onto the ProcureConnect Platform but ultimately decided not to progress, as the Platform would not be ready in time for the C3 Modernisation Programme launch. Instead, DIA enhanced the Marketplace Platform and the risk was closed. No project milestone slipped.

8. *What activities or staffing will absorb the GDDA's $603,000 Budget 2026 baseline reduction?*

The FY2026/27 Baseline reduction of $603,000 for the Government Digital Delivery Agency (GDDA) will be met from savings realised via the Fiscal Sustainability Programme

undertaken when the function was part of DIA. The Fiscal Sustainability Programme commenced in August 2024, with the new organisational structure implemented on 1 December 2025.

As a result, no specific staffing reductions, vacancy management measures, reductions in contractors or consultants, or reductions to services, programmes, projects, or activities have been identified to meet this Baseline reduction. The reduction will be accommodated through savings and efficiencies already realised through the Fiscal Sustainability Programme.

9. *Please clarify the CISO "silence as acceptance" entry: what is meant by the statement that "No responses were received and reliance placed exclusively on 'Silence as acceptance'"?*

During consultation with agencies for the CMA Part 2 security terms, agencies were informed that if they did not respond, silent procedure would apply. Silent procedure is a decision-making approach where a proposal is considered approved if there are no objections before a set deadline. In this case, silence was taken as agreement to the security terms.

10. *Which agency CISOs were asked to provide written endorsement of the CMA Part 2 security provisions?*

Agency CISOs were not directly asked to provide written endorsement of the CMA Part 2 security terms. Rather, on 27 November 2025, the following agencies were asked to agree to the terms:

- Accident Compensation Corporation
- Central Agencies Shared Services
- Civil Aviation Authority
- Department of Corrections
- Fire and Emergency New Zealand
- Health New Zealand
- Inland Revenue
- Kainga Ora
- Land Information New Zealand
- Ministry for Primary Industries
- Ministry of Business, Innovation, and Employment
- Ministry of Foreign Affairs and Trade
- Ministry of Health
- Ministry of Justice
- Ministry of Social development
- National Cyber Security Centre
- New Zealand Transport Agency
- Public Health and Forensic Science
- Reserve Bank of New Zealand
- The Audit Office

11. *Have written endorsements from agencies subsequently been obtained as of the time of writing, if so; from which agencies on which dates?*

Endorsement was not sought from agencies. Inland Revenue and the National Cyber Security Centre responded to the request expressing support for the terms, not explicit endorsement. Inland Revenue feedback was received on 26 February 2026, and National Cyber Security Centre feedback was received on 12 March 2026. Silent procedure was applied for all other agencies.

12. *On what authority or decision was non-response treated as endorsement?*

The silent procedure approach noted above was approved by the DIA Manager Security, All of Government Services Delivery.

13. *Please provide a copy of any document that records the Deputy Secretary's final approval/sign-off for any Provisional and/ or Final CMA Part 2 Terms.*

Please find enclosed the email from the GDDA Deputy Secretary containing final approval of the CMA Part 2 terms.

Item	Date	Document Description	Decision
1	13 March 2026	C3 Terms and Conditions Memo for Deputy Secretary Sign out	Released in part

I have decided to release the document listed above, subject to information being withheld under section 9(2)(a) of the OIA in order to protect the privacy of natural persons.

Information being withheld – parts one and two

1. *A copy of the KPMG cost-of-compliance assessment and EY findings referred to in the March status report.*
2. *The names of the four TaaS suppliers that initially refused to sign the transition CAA. Please clarify whether the four have subsequently signed as of the time of writing. I note that, regarding s 9(2)(b)(ii), there is a public-interest argument for this information being released now that the negotiations are historical.*

I have decided to withhold the information requested in parts one and two of your request in full under the following sections of the OIA, as applicable:

- section 6(a) – to prejudice the security or defence of New Zealand or the international relations of the Government of New Zealand
- section 9(2)(b)(ii) – 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
- section 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.

Publicising that suppliers 'refused' to sign the Change Authorisation Agreement (CAA) could create a misleading impression of the suppliers conduct and could reasonably be expected to prejudice the suppliers' commercial position and reputation in the government procurement market. However, the Commission can confirm that three out of the four

suppliers have signed the CAA at the time of your request. The fourth supplier elected not to sign.

In making my decision, I have considered the public interest considerations in section 9(1) of the OIA.

If you wish to discuss this decision with us, please feel free to contact Enquiries@publicservice.govt.nz.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

Please note that we intend to publish this response (with your personal details removed) on the Commission's website.

Yours sincerely



Nicky Dirks
Manager – Ministerial and Executive Services
Public Service Commission Te Kawa Mataaho

From: Myles Ward <Myles.Ward@dia.govt.nz>
Sent: 20 March 2026 10:15
To: Danielle Finnie <Danielle.Finnie@dia.govt.nz>; Richard Ashworth <Richard.Ashworth@dia.govt.nz>
Subject: RE: C3 Memo for Myles's signout

This is approved subject to the changes made for para 19 and 20 and the appendix. Richard, can you show me those changes.

Myles

From: Danielle Finnie <Danielle.Finnie@dia.govt.nz>
Sent: 16 March 2026 12:36
To: Myles Ward <Myles.Ward@dia.govt.nz>
Subject: FW: C3 Memo for Myles's signout

Hi Myles,

For your sign-out please.

Dani

From: Richard Ashworth <Richard.Ashworth@dia.govt.nz>
Sent: Friday, March 13, 2026 6:05 PM
To: Danielle Finnie <Danielle.Finnie@dia.govt.nz>
Subject: C3 Memo for Myles's signout

Hi Dani,

Can you please add to Myles's signouts – we have discussed this a few times and we have made all relevant changes, and added in the endorsements required.

This is now getting urgent so would appreciate this being prioritised. The linked appendices are quite substantial but I don't expect Myles to read all of the Part 2 terms (Appendix 2) or the presentation (appendix 1) – these are for reference if needed.

Have a great weekend. C3 terms and conditions Memo v1.0 March 2026.docx

Ngā mihi,
Richard

Richard Ashworth (he/him)
General Manager Government Digital Services Delivery
Digital Services | Te Pūnaha Matihiko
Te Tari Taiwhenua | Department of Internal Affairs
Mobile: 9(2)(a) privacy
45 Pipitea Street, Thorndon | PO Box 805, Wellington 6140, New Zealand
| www.dia.govt.nz
Facebook | LinkedIn

