



This document has been proactively released. Redactions have been made consistent with s 9(2)(a) of the Official Information Act 1982.

28 March 2018

Mr Doug Martin  
Martin Jenkins & Associates  
142 Featherston Street  
Wellington

Dear Mr Martin

Please find attached a bundle of information that sets out the details of MBIE's engagement of external security consultants and services since 2012. The information we have included reflects the conversation Adrian Renault and I had with you and Sarah Baddeley on Wednesday 21 March 2018 and is in addition to the following which has been provided already:

- The unredacted response to the Official Information Act request made by Greenpeace ("the OIA bundle");
- A bundle of information relating to the all of government protective security panel;
- An email constituting advance notice of the New Zealand Advantage Petroleum Conference 2018, which is being held in Wellington this week;
- A bundle of information about MBIE's Code of Conduct, the interim Code of Conduct, and the MBIE legacy agency Codes of Conduct;
- Information relating to a Callaghan Innovation research and development grant that was referenced in the OIA bundle;
- A bundle of information in relation to MBIE's social media policies;
- Further information in relation to the New Zealand Advantage Petroleum Conference being held this week; and
- An overview of MBIE's evolving approach to protective security requirements and stewardship of its regulatory systems.

#### Information gathering process

As discussed, in order to currate this bundle of information, we:

- Asked the various business groups in MBIE to provide details from their records;
- Ran a search against the Finance and Performance records; and
- Ran a check of MBIE's contract management system.

MBIE recently installed a new contract management system (**CMS**) which went live in December of 2016. The CMS is designed to hold all contracts that were executed after it went live. All contracts executed before the go-live date were not transferred over to the CMS. Accordingly, our ability to locate contracts entered into prior to that date is dependent on those having been filed in a retrievable location.

Also, any contracts with a value of less than \$1500 are not required to be lodged in the CMS. This is particularly relevant to the identification of security guard services, which are often one-off engagements and do not reach that threshold.

Conflicts of interest (entertainment, hospitality or gifts)

You specifically asked for details of any corporate entertainment, gifts or hospitality from TCIL (or any of its subsidiaries) or any other security or investigatory service provider declared by MBIE employees/contractors. MBIE's Sensitive Expenditure Policy sets out guidance on declaring gifts and hospitality that employees have accepted. All gifts that are accepted over the value of \$50 must be declared in the conflicts of interest register.

We undertook a search of the conflicts of interest register against TCIL and various other security service providers who have been routinely engaged by MBIE. No entries of the nature you have indicated you are interested in were returned in that search. For the sake of completeness, individual managers in the Energy, Resources and Markets Branch were also asked to check that there was nothing that might fall within scope of your request in that area and which might not have been registered. Again, nothing of relevance was found.

In terms of the conflicts of interest register, it is possible that people may have made declarations in respect of gifts etc provided by an individual rather than the company that they work for. Accordingly, if you would like us to run a search of the register against particular named individuals who work (or previously worked for) service providers we can do that.


Arrangement of bundle

The attached bundle includes contracts and invoices where we have been able to locate these. In some areas (e.g. the use of security guards) the amounts of money involved were not significant and there were no contracts. In that area, we have compiled what information we have into a short description focused on the nature of the services, which MBIE groups used the services, and in what circumstances. In some areas where the nature of the services have an investigative or surveillance quality we have tended to provide a narrative to accompany the relevant documents in order to provide the contextual detail about the particular function the services have supported and what outcomes this has contributed to.

Tab 7 sets out the results of the searches that were run against MBIE's financial management information system. These were run in bulk against identified entities who had provided services. Some of the information will duplicate information provided by groups who were able to produce invoices or details of payments made, although that was not the case in all instances.

Please do not hesitate to contact me if you would like to discuss anything included or would like further information.

Yours sincerely



Allison Bennett  
Director, Legal Services  
Ministry of Business, Innovation and Employment