



13 November 2025



Ref: OIA-2025/26-0128

Tēnā koe [REDACTED],

Official Information Act request relating to Communications regarding Royal Commission of Inquiry – COVID Phase 2

Thank you for your Official Information Act 1982 (the Act) request, received on 20 August 2025. You requested:

“all communication between any members of the Royal Commission of Inquiry - COVID Phase 2 and any members of DPMC. This includes, but is not limited to, any emails, briefings, text of phone calls, text messages (on any platform) or any other information.”

We have interpreted your request as seeking all communications between DPMC and one or more of the members for Phase 2 of the Royal Commission of Inquiry (COVID-19 Lessons). The first communications we have identified as relating to Phase 2 date from 7 November 2024. Therefore, the timeframe for information relevant to your request has been interpreted as from that date until 20 August 2025.

Under section 15A of the Act, the time frames for responding were extended by 42 working days, until 17 November 2025 because of the consultations that were needed before a decision could be made on your request. Following that extension, I am now in a position to respond.

Information being released

I have decided to release the relevant parts of the communications identified as in scope of your request, subject to information being withheld as noted. The sections of the Act under which information has been withheld are:

- 6(c), to protect the maintenance of the law, including the prevention, investigation, and detection of offences, and the right to a fair trial
- 9(2)(a), to protect the privacy of individuals
- 9(2)(ba)(i), to protect the supply of similar information in the future.

In making my decision, I have considered the public interest considerations in section 9(1) of the Act. No public interest has been identified that would be sufficient to outweigh the reasons for withholding that information.

Date	Email subject line	Decision
22 January 2025	<i>Phase 2 Procedural Minute (including Attachment)</i>	Release email, some information withheld under s9(2)(a). Attachment refused under s18(d) [refer to 'Information publicly available' below].

Date	Email subject line	Decision
24 January 2025	<i>Production Orders under s 20 of the Inquiries Act 2013 (including Attachment)</i>	Release email, some information withheld under s9(2)(a). Release attachment.
7 February 2025	<i>DPMC – Request to clarify scope of Production Order</i>	Release, some information withheld under s6(c), s9(2)(a).
18 February 2025	<i>DPMC – Request to clarify scope of Production Order</i>	Release, some information withheld under s6(c), s9(2)(a).
19 February 2025	<i>DPMC – Request to clarify scope of Production Order</i>	Release, some information withheld under s6(c), s9(2)(a).
21 February 2025	<i>DPMC – Request to clarify scope of Production Order</i>	Release, some information withheld under s6(c), s9(2)(a).
22 February 2025	<i>DPMC - Request to clarify scope of Production Order - follow up email</i>	Release, some information withheld under s6(c), s9(2)(a).
26 February 2025	<i>DPMC - Request to clarify scope of Production Order - follow up email</i>	Release, some information withheld under s6(c), s9(2)(a).
28 February 2025	<i>COVID-19 Inquiry: DPMC and [remainder of subject withheld under s6(c)]</i>	Withhold in full under s6(c).
3 March 2025	<i>RCOI into COVID-19 Lessons Learned – transferring evidence to the Inquiry (including Attachment)</i>	Release email, some information withheld under s9(2)(a). Release attachment.
4 March 2025	<i>COVID-19 Inquiry: DPMC and [remainder of subject withheld under s6(c)]</i>	Withhold in full under s6(c).
7 March 2025	<i>DPMC secure file share (including Attachment)</i>	Release email, some information withheld under s9(2)(a), s9(2)(ba)(i). Release attachment.
7 March 2025	<i>The Department of the Prime Minister and Cabinet's response to the Inquiry's production order of 14 January 2025</i>	Release email, some information withheld under s9(2)(a), s9(2)(ba)(i). Release attachment, some information withheld under s6(c).
11 March 2025	<i>Meeting with DPMC on 12 March</i>	Release, some information withheld under s6(c).
19 March 2025	<i>DPMC: Follow-up from meeting with the RCOI on 12 March</i>	Release, some information withheld under s6(c), s9(2)(a).
24 March 2025	<i>RCOI C-19: DPMC and [part of subject withheld under s6(c)], section 15 orders</i>	Release, some information withheld under s6(c), s9(2)(a).
25 March 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
25 March 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
25 March 2025	<i>Cancelling meetings with DPMC now that you are meeting regularly with Victoria Casey for the Crown departments</i>	Release, some information withheld under s9(2)(a).
27 March 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
27 March 2025	<i>[Subject withheld under s6(c)]</i>	Release email, some information withheld under s6(c), s9(2)(a). Attachment withheld under s6(c).
28 March 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c).
28 March 2025	<i>DPMC [remainder of subject withheld]</i>	Release, some information

Date	Email subject line	Decision
	<i>under s6(c)</i>	withheld under s6(c), s9(2)(a).
7 April 2025	<i>Inquiry</i>	Release, some information withheld under s6(c), s9(2)(a).
10 April 2025	<i>[Subject withheld under s6(c)]</i>	Release email, some information withheld under s6(c), s9(2)(a). Attachment withheld under s6(c).
10 April 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
14 April 2025	<i>[Subject withheld under s6(c)] – next steps</i>	Release email, some information withheld under s6(c), s9(2)(a). Attachment withheld under s6(c).
16 April 2025	<i>RCOI – undertakings (FYI)</i>	Release email, some information withheld under s6(c), s9(2)(a). Attachment withheld under s6(c).
16 April 2025	<i>[Subject withheld under s6(c)]</i>	Release email, some information withheld under s6(c), s9(2)(a). Two attachments withheld under s6(c). One attachment refused under s18(d) [refer to 'Information publicly available' below].
16 April 2025	<i>DPMC response to the Inquiry's letter of 2 April 2025</i>	Release email, some information withheld under s6(c), s9(2)(a), s9(2)(ba)(i). Release attachment, some information withheld under s6(c).
16 April 2025	<i>DPMC secure file share</i>	Release, some information withheld under s9(2)(a), s9(2)(ba)(i).
16 April 2025	<i>DPMC response to the Inquiry's letter of 2 April 2025</i>	Release, some information withheld under s6(c), s9(2)(a), s9(2)(ba)(i).
22 April 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
28 April 2025	<i>COVID19 Inquiry [remainder of subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
30 April 2025	<i>Call - now or after 3 suit?</i>	Release, some information withheld under s9(2)(a).
1 May 2025	<i>[Subject withheld under s6(c)]</i>	Release email, some information withheld under s6(c). Attachment withheld under s6(c).
5 May 2025	<i>DPMC [remainder of subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
7 May 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c).
8 May 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
9 May 2025	<i>[Subject withheld under s6(c)]</i>	Release email, some information withheld under s6(c), s9(2)(a).

Date	Email subject line	Decision
		Attachment withheld under s6(c)
9 May 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c).
27 June 2025	<i>[Subject withheld under s6(c)]</i>	Release, some information withheld under s6(c), s9(2)(a).
1 August 2025	<i>DPMC secure file share</i>	Release, some information withheld under s9(2)(a), s9(2)(ba)(i).
4 August 2025	<i>Corrected version – replacement of received copy with corrected paper</i>	Release, some information withheld under s6(c), s9(2)(a), s9(2)(ba)(i).

Information publicly available

The following information is also covered by your request and is publicly available on the indicated websites:

Date	Document description	Website address
6 September 2019	Dotcom v Attorney-General [2019] NZCA 412	https://www.justice.govt.nz/jdo_documents/workspace_SpacesStore_9f079fd6_03bd_4d13_9ce5_1af75e452167.pdf
7 November 2024	COVID-19 Inquiry Pānui: Issue 14	https://www.covid19lessons.royalcommission.nz/news/covid-19-inquiry-panui-issue-14
18 December 2024	Phase Two: Minute 1	https://www.covid19lessons.royalcommission.nz/assets/Uploads/18122024-Phase-Two-Minute-1-FINAL.pdf
3 February 2025	COVID-19 Inquiry Pānui: Issue 16	https://www.covid19lessons.royalcommission.nz/news/covid-19-inquiry-panui-issue-16
11 March 2025	COVID-19 Inquiry Pānui: Issue 17	https://www.covid19lessons.royalcommission.nz/news/covid-19-inquiry-panui-issue-17
8 April 2025	COVID-19 Inquiry Pānui: Issue 18	https://www.covid19lessons.royalcommission.nz/news/covid-19-inquiry-panui-issue-18
16 May 2025	COVID-19 Inquiry Pānui: Issue 19	https://www.covid19lessons.royalcommission.nz/news/covid-19-inquiry-panui-issue-19
2 July 2025	COVID-19 Inquiry Pānui: Issue 20	https://www.covid19lessons.royalcommission.nz/news/covid-19-inquiry-panui-issue-20
6 August 2025	COVID-19 Inquiry Pānui: Issue 21	https://www.covid19lessons.royalcommission.nz/news/covid-19-inquiry-panui-issue-21
13 August 2025	An update on the Inquiry public hearings	https://www.covid19lessons.royalcommission.nz/news/public-hearing-for-decision-makers-will-no-longer-proceed-inquiry-chair

Accordingly, I have refused your request insofar as it relates to these materials under section 18(d) of the Act – the information requested is publicly available.

You have the right to ask the Ombudsman to investigate and review my decision under section 28(3) of the Act.

This response will be published on the Department of the Prime Minister and Cabinet's website during our regular publication cycle. Typically, information is released monthly, or as otherwise determined. Your personal information including name and contact details will be removed for publication.

Nāku noa, nā



Alan Cassidy
Deputy Chief Executive, Corporate and Chief People Officer

From: [RCOICoVID-19 \[DPMC\]](#)
To: [Inquiry into COVID-19 lessons](#)
Subject: RE: Phase 2 Procedural Minute
Date: Wednesday, 22 January 2025 11:45:53 am
Attachments: [image002.png](#)
[image003.png](#)

Thanks Janisha
Hope you have a good day too.
Kathy

From: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Sent: Tuesday, January 21, 2025 4:58 PM
To: RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>
Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Subject: RE: Phase 2 Procedural Minute

Tēnā koe Kathy,

It's lovely to e-meet you – thank you for reaching out.
I'm Janisha from the Communications and Engagement team and I tend to look after this mailbox for the Inquiry.

Thank you for letting us know that Minute 1 for Phase Two has disappeared from our website.

We became aware of this issue earlier today and are working to restore it.
In the meantime, I've attached a copy for your reference.

I hope you have a lovely rest of your day.

Ngā manaakitanga,

Janisha Nathu (she/her)
**Senior Communications and
Engagement Advisor**
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
[e \[janisha.nathu@dia.govt.nz\]\(mailto:janisha.nathu@dia.govt.nz\)](mailto:janisha.nathu@dia.govt.nz)
covid19lessons.royalcommission.nz



From: RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>
Sent: Tuesday, 21 January 2025 1:50 pm
To: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Subject: Phase 2 Procedural Minute

[UNCLASSIFIED]

Kia ora team

Introducing myself, as I am leading the policy lead at DPMC. No doubt I will have further contact with the Inquiry team and Helen Pōtiki, as the Executive Director.

But, a little technical matter in the meantime.

You may already be aware of it, but the Phase 2 procedural minute is no longer on the Commissions web site at this link:

[Procedural Minutes | Covid-19 Lessons Learned](#)

Ngā mihi

Kathy Perreau ([she/her](#))

Principal Advisor

COVID-19 Royal Commission of Inquiry

Strategy, Governance and Engagement Group

Department of the Prime Minister and Cabinet

P +64 (4) s 9(2)(a)

E Kathy.Perreau@dPMC.govt.nz

Email RCOICOVID-19@dPMC.govt.nz



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From: [Clare Ward \[DPMC\]](#)
To: [Inquiry into COVID-19 lessons](#)
Cc: [Kathy Perreau \[DPMC\]](#); [Fiona Bawden \[DPMC\]](#); [Annabel Ritchie \[DPMC\]](#)
Subject: Re: Production Orders under s 20 of the Inquiries Act 2013
Date: Friday, 24 January 2025 11:39:41 am
Attachments: [image001.png](#)
[image002.png](#)

Will do. Thanks.

Ngā mihi

Clare

Clare Ward (she/her)
Executive Director
Strategy, Governance and Engagement
Department of the Prime Minister and Cabinet

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From: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Sent: Friday, January 24, 2025 11:10:57 AM
To: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>
Cc: Gill Lockhart [DPMC] <Gill.Lockhart@dpmc.govt.nz>; Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>; Helen Potiki <Helen.Potiki2@dia.govt.nz>; Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>
Subject: RE: Production Orders under s 20 of the Inquiries Act 2013

Tēna koe Clare,

I hope you are doing well.

Thank you for confirming receipt of the Inquiry's section 20 order and for letting us know about DPMC's dedicated email address.

I have made a note of this and will ensure any future correspondence includes this email address.

Similarly, we would appreciate it if DPMC could copy InquiryintoCOVID-19lessons@dia.govt.nz in any future correspondence. This will help us manage any

correspondence or queries in a timely manner.

Ngā manaakitanga,

Janisha Nathu (she/her)
Senior Communications and
Engagement Advisor
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e janisha.nathu@dia.govt.nz
covid19lessons.royalcommission.nz



From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>

Sent: Thursday, January 23, 2025 12:14 PM

To: Helen Potiki <Helen.Potiki2@dia.govt.nz>

Cc: Gill Lockhart [DPMC] <Gill.Lockhart@dpmc.govt.nz>; Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>

Subject: FW: Production Orders under s 20 of the Inquiries Act 2013

You don't often get email from clare.ward@dpmc.govt.nz. [Learn why this is important](#)
[UNCLASSIFIED]

Morena Helen,

Long time no see. Hope you're enjoying the new role.

We acknowledge receipt of the Royal Commission's Information Request, dated 14 January 2025. The Department will assist you, to the best of its abilities, to enable the Phase Two commissioners to undertake their Inquiry.

I am the DPMC Executive Leadership Team member who will be overseeing this process within DPMC. To enable us to efficiently manage requests, we have established a dedicated email address: RCOICCOVID-19@dpmc.govt.nz, it would help us if you could please ensure this address is copied into any requests for information from the Inquiry (as this inbox will be the primary point of contact at DPMC).

Ngā mihi

Clare

Clare Ward (she/her)
Executive Director
Strategy, Governance and Engagement
Department of the Prime Minister and Cabinet

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[REDACTED]

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From: Helen Potiki <Helen.Potiki2@dia.govt.nz>
Sent: Wednesday, January 8, 2025 11:12:39 AM
To: Ben King [DPMC] <Ben.King@dpmc.govt.nz>
Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Subject: Production Orders under s 20 of the Inquiries Act 2013

Tēnā koe Ben

Please find attached letter.

Ngā mihi

Helen Potiki - *Kāi Tahu, Tapuika, Te Aitanga-a-Hauiti*
Executive Director
Royal Commission of Inquiry (COVID-19 Lessons)
New Zealand

Phone: +64 [REDACTED] 9(2)(a)

Email: Helen.Potiki2@dia.govt.nz

www.covid19lessons.royalcommission.nz

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8 January 2025

Ben King

Chief Executive

Department of the Prime Minister and Cabinet | Te Tari o te Pirimia me te Komiti Matua

ben.king@dpmc.govt.nz

Tēnā koe Ben

Production Orders under s 20 of the Inquiries Act 2013

As you will be aware, the Government established¹ a second phase of the Royal Commission of Inquiry (COVID-19 Lessons) to review key decisions made by the Government in response to the COVID-19 pandemic during 2021 and 2022 (“Inquiry”).

The Phase Two commissioners have instructed me to inform you that the Inquiry will shortly be requiring information from your agency by way of production orders under section 20 of the Inquiries Act 2013 (“Act”)²

Production orders may include requests for information that your agency has previously submitted to Phase One of the Inquiry. This may be necessary because of confidentiality arrangements and orders made under section 15 of the Act during Phase One. We appreciate that responding to production orders will be a significant task, especially as your agency’s response will need to be provided within a tight time-frame due to the Inquiry’s current reporting obligations.

Under section 15 of the Act, the Phase Two commissioners have made an interim order that, pending completion of the final report, or further order of the Inquiry, access to submissions or evidence shall be limited to the commissioners and officers of the Inquiry. I draw your attention to Phase Two: Minute One³ issued on 18 December 2025.

If you have any questions, or require clarification, please contact me directly.

Ngā mihi

Helen Potiki

Executive Director

¹ <https://www.legislation.govt.nz/regulation/public/2024/0177/latest/LMS984292.html>

² Inquiries Act 2013 No 60 (as at 23 December 2023), Public Act – New Zealand Legislation

³ [Procedural Minutes | Covid-19 Lessons Learned](#)

From: [Clare Ward \[DPMC\]](#)
To: [Inquiry into COVID-19 lessons](#); [Helen Potiki](#)
Cc: [RCOICoVID-19 \[DPMC\]](#)
Subject: RE: DPMC - Request to clarify scope of Production Order
Date: Friday, 7 February 2025 10:10:35 am
Attachments: [image001.png](#)
[image002.png](#)

Thanks, we look forward to hearing from you.

Ngā mihi

Clare

Clare Ward (she/her)
Executive Director
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From: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Sent: Friday, 7 February 2025 10:04 am
To: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>; Helen Potiki <Helen.Potiki2@dia.govt.nz>
Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>
Subject: RE: DPMC - Request to clarify scope of Production Order

Mōrena Clare,

I hope you are doing well.

Thank you for your email on Wednesday.

I have shared it with our leadership team, and we will get back to you soon.

Have a lovely rest of your week.

Ngā manaakitanga,

|

Janisha Nathu (she/her)
Senior Communications and
Engagement Advisor
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e janisha.nathu@dia.govt.nz
covid19lessons.royalcommission.nz

★
★
★
TE TIRA ĀRAI URUTĀ
**NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED**

From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>
Sent: Wednesday, 5 February 2025 3:24 pm
To: Helen Potiki <Helen.Potiki2@dia.govt.nz>
Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>
Subject: DPMC - Request to clarify scope of Production Order

You don't often get email from clare.ward@dpmc.govt.nz. [Learn why this is important](#)

[IN-CONFIDENCE]

Kia ora Helen,

As DPMC has been working through our response to the Inquiry's production order, it has become apparent to us that the order can be read in two ways, i.e. either:

- that the inquiry would s 6(c) [REDACTED]
[REDACTED]
[REDACTED] or
- that the inquiry wishes s 6(c) [REDACTED]
[REDACTED]
[REDACTED]:

For example, if the request is s 6(c) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

If we took the s 6(c) approach, s 6(c) [REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

We are comfortable with either approach, but we note that with regard to DPMC, given the central role we provided in the response, the volume of material we hold in respect of each key decision is vast. For example, DPMC records show 1310 emails associated with the development of lockdown cabinet papers between 17 August 2021 and 15 November 2021

alone. We are conscious that this could create handling issues at your end, and a lot of collation work at our end, so want to ensure that we are responding to the Inquiry in the most helpful manner. We would also value the opportunity to discuss some of the practical ways in which the high volume could be dealt with, if the s 6(c) approach is adopted, including for example providing information in tranches.

We would value the opportunity to discuss these issues perhaps with between our lawyers (Victoria Casey and DPMC legal) and counsel assisting the inquiry, to ensure that we are working effectively, and dealing with issues upfront. Victoria would be happy to contact counsel assisting (Kristy or Nick) directly if that is the most expedient.

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

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From: [Clare Ward \[DPMC\]](#)
To: Helen.Potiki2@dia.govt.nz
Cc: [Inquiry into COVID-19 lessons](#); [RCOICoVID-19 \[DPMC\]](#)
Subject: RE: DPMC - Request to clarify scope of Production Order
Date: Tuesday, 18 February 2025 2:05:43 pm
Attachments: [image001.png](#)

Kia ora Helen,

I am following up regarding my email of 5 February (below) about the Department's work to support the Commission of Inquiry.

We would really appreciate the opportunity to discuss our approach with the Inquiry to ensure we are able to progress this efficiently. The ^{s 6(c)} interpretation is meaning DPMC is needing to review in excess of 8,000 documents to determine relevance.

I suggest our legal team (Victoria Casey KC and our inhouse legal counsel) touches base with Counsel Assisting directly, given the timeframes. Please advise if you have any concerns with us reaching out directly.

There are two other matters, we also wish to raise:

s 6(c)

[Redacted text block]

Ministerial Advisory Groups

During the Covid response, DPMC provided secretariat support to two **Ministerial Advisory Groups** who provided independent advice to Ministers:

- the COVID-19 Independent Continuous Review, Improvement and Advice Group (CICRIAG), chaired by Sir Brian Roche and
- Strategic COVID-19 Public Health Advisory Group (SPHAG), chaired by Sir David Skegg (April 2021 – August 2022).

The Groups' advice was independent and not a product of DPMC.

Our 7 March 2025 response will capture advice that these Groups provided directly to the

COVID-19 Group products (for example, any substantial advice relating to briefings/cabinet papers etc). However, DPMC is not the owner of the Groups' information. If the Inquiry seeks further information from these Groups, in particular any advice they gave to Ministers, the Inquiry will need to approach them directly.

I look forward to hearing from you regarding the above and will ask our team to follow up with Ms McDonald directly, unless we hear otherwise.

We would be happy to discuss any of the above. Please let us know as soon as possible if you have any concerns with our legal team contacting Counsel Assisting directly.

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

Department of the Prime Minister and Cabinet

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E clare.ward@dpmc.govt.nz



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From: Clare Ward [DPMC]

Sent: Wednesday, 5 February 2025 3:24 pm

To: Helen.Potiki2@dia.govt.nz

Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>

Subject: DPMC - Request to clarify scope of Production Order

Duplicate



-
-

From: [Clare Ward \[DPMC\]](#)
To: [Bev Short](#)
Cc: [RCOIC/COVID-19 \[DPMC\]](#); [Inquiry into COVID-19 lessons](#); [Helen Potiki](#); [Janisha Nathu](#); [Kristy P McDonald ONZM KC](#); [Nick.Whittington@hawkestone.co.nz](#)
Subject: RE: DPMC - Request to clarify scope of Production Order
Date: Wednesday, 19 February 2025 2:49:59 pm
Attachments: [image002.png](#)
[image003.png](#)

[IN CONFIDENCE]

Kia ora Bev

Thank you for your response below. However, we would appreciate the opportunity to meet in advance of next week, if at all possible. We are concerned that meeting only 6-8 days prior to the production order due date will provide limited opportunities for DPMC to refine its approach.

Our team have advised that the searches have identified over 10,000 documents, which continue to be refined and considered for relevance. The team have to date assessed approximately 15% of the 10,000 documents with at least 500 documents identified as being potentially relevant so far.

We are endeavouring to provide ^{s6(c)} [redacted] by the 7 March. However, we would greatly appreciate the opportunity to talk with the Inquiry on the best way to prioritise the remaining information ^{s6(c)} [redacted] to ensure it is useful for the Inquiry, whilst not overwhelming the resources of the Inquiry and DPMC. For example, could this information be provided in tranches with an extension to the 7 March deadline – we would be happy to prioritise which documents would be of greatest priority to the Inquiry, so we can sequence the wider tranches accordingly.

Times we **are not** available are:

- Thursday 20 February - 9-10am
- Friday 21 February - 2:30-4:30pm

Ngā mihi

Clare

Clare Ward (she/her)
Executive Director
Strategy, Governance and Engagement
Department of the Prime Minister and Cabinet

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[redacted]

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From: Bev Short <Bev.Short@dia.govt.nz>

Sent: Tuesday, 18 February 2025 4:14 pm

To: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>

Cc: RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>; Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; Helen Potiki <Helen.Potiki2@dia.govt.nz>; Janisha Nathu <Janisha.Nathu@dia.govt.nz>; Kristy P McDonald ONZM KC <KMcdonald@kmmc.nz>; Nick.Whittington@hawkestone.co.nz

Subject: RE: DPMC - Request to clarify scope of Production Order

Hi Clare, having problems with SEEMail so I am re-sending with certain bits taken out of emails below which could be holding the 'offending' wording.

Best wishes

Bev Short (she/her)
Executive Assistant to Commissioners
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned

e bev.short@dia.govt.nz
covid19lessons.royalcommission.nz



NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED

From: Bev Short <Bev.Short@dia.govt.nz>

Sent: Tuesday, February 18, 2025 4:09 PM

To: Clare Ward <clare.ward@dpmc.govt.nz>

Cc: RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>; Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; Helen Potiki <Helen.Potiki2@dia.govt.nz>; Janisha Nathu <Janisha.Nathu@dia.govt.nz>; Kristy P McDonald ONZM KC <KMcdonald@kmmc.nz>; Nick.Whittington@hawkestone.co.nz

Subject: RE: DPMC - Request to clarify scope of Production Order

Good afternoon Clare

I refer to your correspondence below and am writing to suggest we set up a 30 minute Teams meeting for you with our Executive Director, Helen Pōtiki, and Counsels Assisting – Kristy McDonald KC and Nick Whittington.

The suggested times are below:

- Tuesday 25 February : between 3.00 and 5pm

Wednesday 26 February : 10.30 – 11.00am

- Thursday 27 February : between 9.00 and 11.30am

Please let me know what will work for you and I will send a calendar invite.

Many thanks and best wishes

Bev Short (she/her)

Executive Assistant to Commissioners

Te Tira Ārai Urutā – NZ Royal

Commission COVID-19 Lessons

Learned

e bev.short@dia.govt.nz

covid19lessons.royalcommission.nz



From: Clare Ward

Sent: Friday, February 7, 2025 10:11 AM

To: Inquiry into COVID-19 lessons ; Helen Potiki

Cc: RCOICOID-19 [DPMC]

Subject: RE: DPMC - Request to clarify scope of Production Order

You don't often get email from clare.ward@dpmc.govt.nz. [Learn why this is important](#)

Thanks, we look forward to hearing from you.

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

Department of the Prime Minister and Cabinet

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M +64 [s 9\(2\)\(a\)](tel:+64920000000)

E clare.ward@dpmc.govt.nz

From: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>

Sent: Friday, 7 February 2025 10:04 am

To: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>; Helen Potiki

<Helen.Potiki2@dia.govt.nz>

Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>;

RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>

Subject: RE: DPMC - Request to clarify scope of Production Order

Mōrena Clare,

I hope you are doing well.

Thank you for your email on Wednesday.

I have shared it with our leadership team, and we will get back to you soon.

Have a lovely rest of your week.

Ngā manaakitanga,

Janisha Nathu (she/her)

**Senior Communications and
Engagement Advisor**

**Te Tira Ārai Urutā – NZ Royal
Commission COVID-19 Lessons
Learned**

e janisha.nathu@dia.govt.nz

covid19lessons.royalcommission.nz



From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>

Sent: Wednesday, 5 February 2025 3:24 pm

To: Helen Potiki <Helen.Potiki2@dia.govt.nz>

Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>;

RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>

Subject: DPMC Request to clarify scope of Production Order

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duplicate

- [Redacted]
- [Redacted]

From: [Helen Potiki](#)
To: [Clare Ward \[DPMC\]](#)
Cc: [Annabel Ritchie \[DPMC\]](#); [RCOICovid-19 \[DPMC\]](#); [Inquiry into COVID-19 lessons](#)
Subject: RE: DPMC - Request to clarify scope of Production Order - follow up email
Date: Saturday, 22 February 2025 12:22:38 pm
Attachments: [image001.png](#)

Kia ora Clare and Annabel

Thank you for the meeting yesterday and this follow up email in which you have set out our discussion very clearly.

I will come back to you following Commissioners' consideration, and in the meantime, I'll go ahead and set up a fortnightly meeting.

Ngā mihi and thanks again

Helen

From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>
Sent: Friday, February 21, 2025 4:55 PM
To: Helen Potiki <Helen.Potiki2@dia.govt.nz>
Cc: Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>; RCOICovid-19 [DPMC] <RCOICovid-19@dpmc.govt.nz>; Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Subject: DPMC - Request to clarify scope of Production Order - follow up email

Kia ora Helen,

Thank you for your time this morning, it was great to touch base in person (albeit virtually). We understand the Chair has also connected with Victoria Casey, KC.

In terms of the ^{s6(c)} approach, the process as set out below may assist the Inquiry to identify key material it requires, whilst also ensuring the volume of documents is manageable for the Inquiry and DPMC:

Information to be provided by 7 March:

^{s6(c)}



?? We also note the convention on access to Cabinet records of a previous administration, as set out in the Cabinet Manual (8.136 -151). This requires DPMC to consult with the leader of the opposition (LOTO) prior to the release of any cabinet material. Accordingly, we wanted to give you a heads up that DPMC will be seeking interim section 15 orders over these documents to enable this consultation to occur, and whether any material requires ongoing non-publication orders.

Other materials the Inquiry may require (post 7 March 2025)

s6(c)



Information presumed to be out of scope of the Production Order

s6(c)



s 6(c)



Ministerial Advisory Committees

?? During the Covid response, DPMC provided secretariat support to two Ministerial Advisory Groups who provided independent advice to Ministers: the COVID-19 Independent Continuous Review, Improvement and Advice Group (CICRIAG), chaired by Sir Brian Roche and the Strategic COVID-19 Public Health Advisory Group (SPHAG), chaired by Sir David Skegg (April 2021 – August 2022).

?? The Groups' advice was independent and not a product of DPMC. If the Inquiry seeks further information from these Groups, in particular any advice they gave to Ministers, the Inquiry will need to approach them directly.

We look forward to hearing from you regarding the above. We also welcome the idea of regular catchups to ensure we are able to support the Inquiry the best we can.

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

Department of the Prime Minister and Cabinet

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Out of Scope

From: Helen Potiki <Helen.Potiki2@dia.govt.nz>
Sent: Wednesday, 26 February 2025 10:03 pm
To: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>
Cc: Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>
Subject: Continuity of engagement

Kia ora Clare

You are likely aware of my and senior counsel assisting's recent resignation from the inquiry.

I want to reassure you that the arrangement that you and I set up to engage fortnightly will stand, and be transitioned to another member of the inquiry.

Once future leadership arrangements including counsel are confirmed, we shall let you know.

It has been good to work with you again if only for a short period.

Very best,

Helen

**Helen Potiki, *Kāi Tahu, Tapuika,*
*Te Aitanga-a-Hauiti***

Executive Director

Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned

m s 9(2)(a)

e helen.potiki2@dia.govt.nz
covid19lessons.royalcommission.nz



TE TIRA ĀRAI URUTĀ

**NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED**

From: [Jenny Coleman-Walker](#)
To: [Clare Ward \[DPMC\]](#)
Cc: [Inquiry into COVID-19 lessons](#); [RCOICOID-19 \[DPMC\]](#)
Subject: RE: RCOI into COVID-19 Lessons Learned – transferring evidence to the Inquiry
Date: Monday, 3 March 2025 6:00:13 pm
Attachments: [image001.png](#)
[image002.png](#)

Kia ora Clare

Thanks for your update email. We are comfortable with this approach.

I will be responsible for accessing your secure file share application so please let me know what I need to do when you are ready.

Ngā mihi,

Jen

Jenny Coleman-Walker (she/her)
Interim Head of Inquiry Support
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19
Lessons Learned

m s 9(2)(a)
e Jenny.Coleman-Walker2@dia.govt.nz
covid19lessons.royalcommission.nz



From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>
Sent: Monday, March 3, 2025 5:27 PM
To: Jenny Coleman Walker <Jenny.Coleman-Walker2@dia.govt.nz>
Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>
Subject: RE: RCOI into COVID-19 Lessons Learned – transferring evidence to the Inquiry

[IN CONFIDENCE]

Kia ora Jenny

Thanks for getting in contact about this. Given that the first tranche of information is due this week, we won't have time to go through our usual checks on new IT-type systems, particularly as our team is busy collating the information for Friday. Therefore, we would intend to send you this week's information through our usual secure file share application which is also approved for information up to RESTRICTED as we need in phase 1. We would be happy to look at your system in future if that is what you'd like.

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

Department of the Prime Minister and Cabinet

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From: Jenny Coleman-Walker <Jenny.Coleman-Walker2@dia.govt.nz>

Sent: Monday, 3 March 2025 11:56 am

To: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>

Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>

Subject: RCOI into COVID-19 Lessons Learned – transferring evidence to the Inquiry

Importance: High

Kia ora Clare,

We have received confirmation that DPMC will be providing information to Te Tira Ārai Urutā – the Royal Commission of inquiry into COVID-19 Lessons Learned, in response to the Inquiry's section 20 production order and that you will be responsible for sharing the material with the Inquiry.

We have set up a secure site on CoLab for you to use to transfer material classified up to and including RESTRICTED to the Inquiry. As part of this process, we will set up a Guest Account for you. As a user you will need to read and accept the attached Terms of Use for External Users by emailing me confirmation that you agree to the terms. Please copy and paste the following text into your confirmation email to me:

I agree to the attached 'Terms of Use for External Users of DIA sites or Teams' with the understanding that the [Official Information Act 1982](#) does not apply to a Commission of Inquiry until the Inquiry delivers its final report(s) under

section 12 of the [Inquiries Act 2013](#). Therefore, clauses 8 and 9 of the Terms of Use are not applicable until Te Tira Ārai Urutā – the Royal Commission of Inquiry into COVID-19 Lessons Learned delivers its report(s) to the Governor-General of New Zealand (due by 26 February 2026). From that point on, [section 32 of the Inquiries Act](#) applies.

Section 32 provides that, after an Inquiry has reported in accordance with section 12, all documents created and received by the Inquiry will be treated as official information for the purposes of the OIA. Please note that Section 32 (2) specifically excludes information that is subject to section 15(1)(a) of the Inquiries Act where restrictions on the access to information has been made by the Commissioners of the Inquiry and any documents that relate to the internal deliberations of the Inquiry.

Once your individual Guest Account has been set up, there will be a few additional steps to complete the registration process.

If your agency has national security information marked as CONFIDENTIAL, SECRET or TOP SECRET please let us know as soon as possible so we can arrange a suitable method for handling the information.

If you have any questions about this process, please let me know.

Ngā mihi,
Jen

Jenny Coleman-Walker
(she/her)
Interim Head of Inquiry Support
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19
Lessons Learned

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SharePoint sites, such as CoLab, or Microsoft Teams are used as collaboration tools by Te Tari Taiwhenua Department of Internal Affairs (**DIA**) staff to collaborate with **External User/s**.

Before you can be granted access to a SharePoint site (**Site**) or Microsoft Team (**Team**), you need to review these Terms of Use and agree to them. This is our way of ensuring that DIA's information remains safe, and that we are providing you with a collaboration tool that you can trust.

Please note DIA will periodically update these Terms of Use to ensure they remain fit for purpose. DIA will provide you with an updated copy if there are substantive changes and you may be required to agree to the revised Terms of Use. These Terms of Use were last updated on **27 March 2023**.

DIA expectations of external users

1. You agree to set up a **DIA Guest Account** after receiving your invitation to access the Site/Team. (As part of setting you up as a Guest User, DIA also requires you to agree to the general *Terms of Use for DIA Guest Accounts*. You will be asked to agree to these separately as part of the registration process.)
2. You agree to use the Site/Team responsibly and you expressly undertake that:
 - a. You will keep confidential all information identified as being confidential, marked with a security classification or commercially sensitive that you access in the Site/Team and will not pass any such information to any other party without the express permission of the owner of the information;
 - b. You will not permit any other party to use your registration and you will keep secure from any other party any password issued to you in connection with the Site/Team; and
 - c. You will notify us if you see material in the Site/Team that may be in breach of these terms of use.
3. Public sector agency External Users agree to comply with the government's security classification guidelines for any official information shared in the Site/Team, in particular:

- a. you acknowledge that the Site/Team is rated for information classified up to and including RESTRICTED;
- b. you must not use the Site/Team to save or share national security information marked as CONFIDENTIAL, SECRET or TOP SECRET;
- c. the information you access and share within the Site/Team must only be shared with people who require this information to carry out their work; and
- d. all information stored in the Site/Team must be marked with a security classification so it is clear to others how this information should be handled.

Please refer to the [government's security classification guidelines](#).

- 4. You acknowledge that DIA is subject to the Public Records Act 2005 (**PRA**) and you agree to comply with any requirements that DIA has in relation to the PRA, in particular you acknowledge that information you create or share using Site/Team will be treated as a DIA record and managed under the PRA.
- 5. You are responsible for ensuring that you have retained the original copy of any information that you have uploaded to the Site/Team or any information that you require from it for your own reference in your own recordkeeping system. For public sector agencies also subject to the PRA, you acknowledge this responsibility of retaining any information from the Site/Team to comply with the PRA.
- 6. You acknowledge that the responsibility of managing, opening and closing the Site/Team resides with the DIA site owner. The DIA site owner will assign you the appropriate permissions to access and work with any information relevant to your collaboration with DIA.
- 7. You acknowledge that when the Site/Team is closed, you will no longer have access to any of the information in it.
- 8. You acknowledge that DIA is subject to the Official Information Act 1982 (**OIA**) and you agree to promptly and cooperatively assist DIA in connection with any request received by DIA for the release of information under the OIA.
- 9. For public sector agency External users also subject to the OIA, you acknowledge that, in relation to any request under the OIA that relates to information held in the Site/Team between the parties:
 - a. Where the request relates more closely to the external agency's functions, then the external agency will be responsible for responding to the OIA request and will consult with DIA on any response to that request where at all possible; and
 - b. Where the request relates more closely to DIA's functions, DIA will be responsible for responding to the OIA request and will consult with you to agree on any response to that request where at all possible.
- 10. You acknowledge that all personal information stored in the Site/Team is subject to the Privacy Act 2020 and the Health Information Privacy Code where applicable. Personal Information is discoverable under Information Privacy Principle 6.
- 11. You will not share personal information relating to customers or staff employed by DIA, public sector organisations or other parties.
- 12. You acknowledge that limited personal information about members of the Site/Team may be stored in it for administrative purposes.

13. You acknowledge that if you change roles within an organisation or move to another organisation, you may no longer have a legitimate reason to access the Site/Team and your access may be removed.
14. You acknowledge that if in the event of a breach of any of these terms of use, your access to the Site/Team will be removed until such time as the breach has been investigated and addressed. DIA will then make a formal decision whether to reinstate your access to the Site/Team and any information in it.
15. You agree to grant DIA a non-exclusive, royalty-free and irrevocable licence to use any of your information uploaded to the Site/Team. If you are uploading any material which includes copyright or other intellectual property owned by a third party, you warrant that you have the right to use that material and to grant the licence referred to it.
16. You acknowledge that SharePoint (including CoLab) and Microsoft Teams information is hosted in Australia.

Disclaimer

17. DIA disclaims and excludes all liability for any claim, loss, demand or damages of any kind whatsoever (including negligence) arising out of or in connection with the use of the Site/Team.

From: [RCOICoVID-19 \[DPMC\]](#)
To: [Jenny Coleman-Walker](#); InquiryintoCOVID-19lessons@dia.govt.nz
Subject: DPMC secure file share
Date: Friday, 7 March 2025 4:34:28 pm
Attachments: [image001.png](#)
[Secure File Share user guide \(External\).docx](#)

[IN-CONFIDENCE]

Kia ora Jenny

Login for the secure file share:

- click on the URL link, and
- enter the password provided to log in

Password:

s 9(2)(ba)(i)

NOTE: Attached is the Secure File Share user guide (External) which has instructions on how to view content

Any difficulties please let me know

Nga mihi

Fiona Bawden ([she/her](#))

Advisor

COVID-19 Royal Commission of Inquiry
Strategy, Governance and Engagement Group
Department of the Prime Minister and Cabinet

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E fiona.bawden@dpmc.govt.nz

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Secure File Share User Guide For External Users

Document Owner: The Business Information Management team

Contents	2
1. Login Screen and File Access	3
2. Home Page	3
3. Downloading Files	4
4. Uploading Files to Share	4
5. Deleting Documents from a Folder	5

Secure File Share (SFS) is certified to share information
with a security classification up to and including

IN-CONFIDENCE

DO NOT put information above security classification

IN-CONFIDENCE in this system

1. Login Screen and File Access

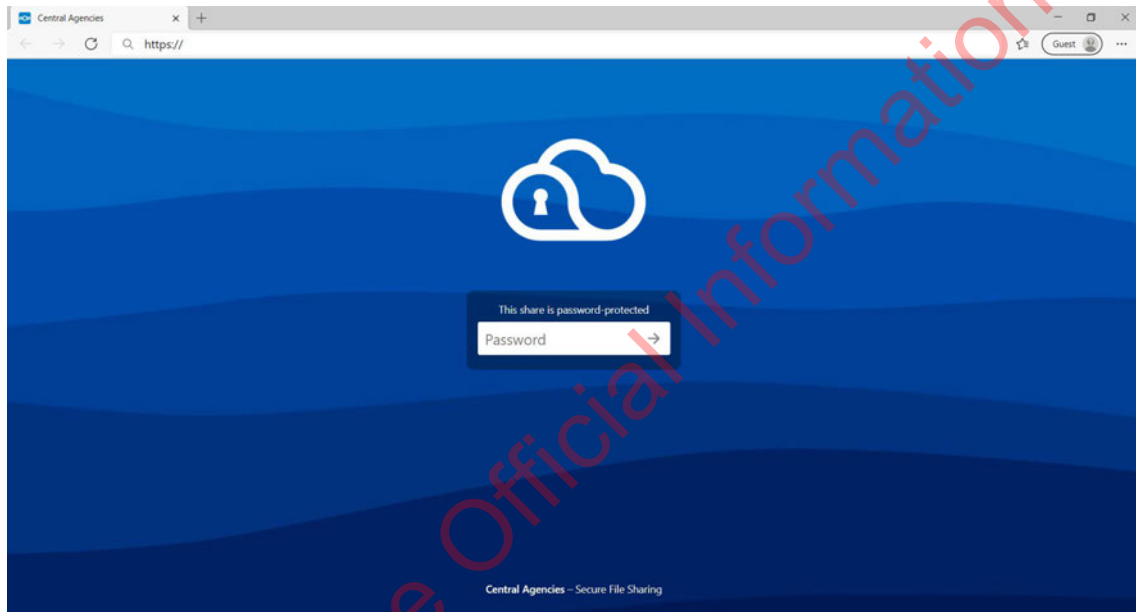
You will need a URL link and a password to access the Secure File Share (SFS) tool. Both will be provided to you by the internal staff member of the Central Agency (the Treasury or the Department of Prime Minister and Cabinet (DPMC)), who you are file sharing with.

The Central Agency staff member will share a link to a document, or a link to a folder in SFS.

1. Click on the URL link

Opening the URL will present you with a login page.

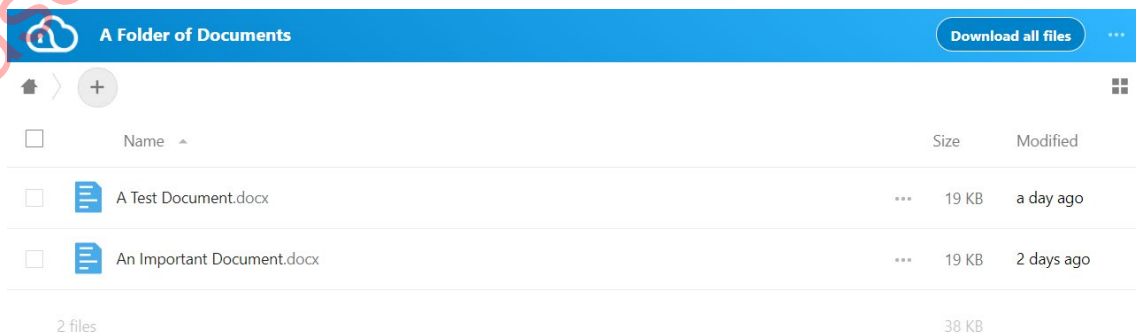
2. Enter the password provided to log in.



2. Home Page

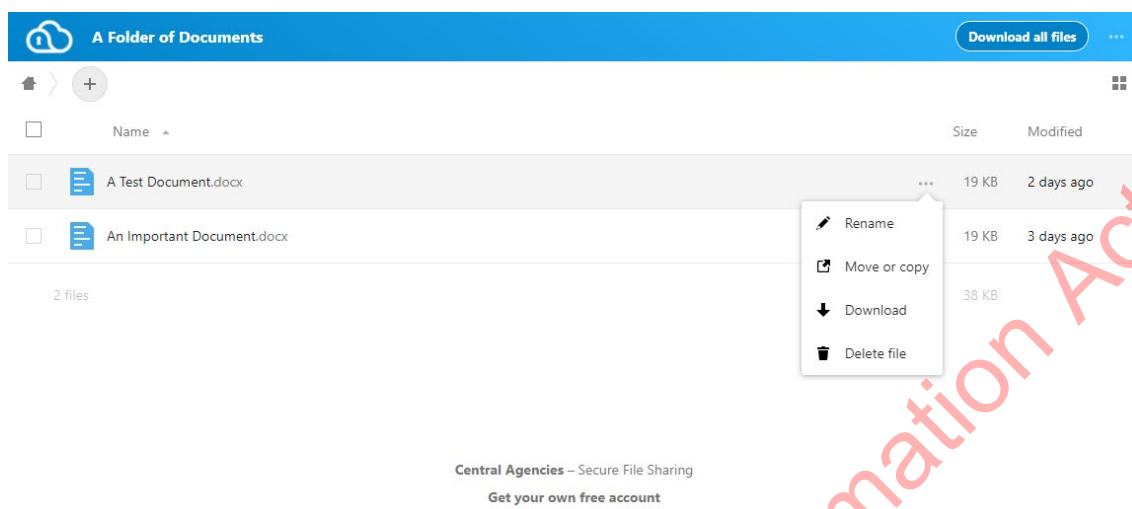
If the link is to 1 document, the document alone will display.

If the link is to a folder, a page like this will display after logging in. Any files that have been shared with you will show in your home page.



3. Downloading Files

Click on the ellipsis (...) next to the file you wish to download and select *Download* from the menu.



If a folder of multiple documents has been shared with you, you can download single files from the folder, and click into sub-folders to view contents. If you select all files using the checkbox, you can click the *Download all files* button in the top banner to download a .zip file containing the files and folders you have selected. It will save to your Windows Explorer.

To return to the home page any time, click on the house (home) icon in the top left corner.

4. Uploading Files to Share

DO NOT put information above security classification **IN-CONFIDENCE** in this system. It is certified to hold information up to and including **IN-CONFIDENCE**.

If a folder has been shared with you, you can upload files into it. On your home page, either click the plus icon in the top left corner or drag and drop files from Windows Explorer into the home screen.

You can also use the plus (+) icon to create sub-folders, to categorise information.

If you attempt to upload a document that already exists in your files list, you will receive a “file conflict” message prompt.



1 file conflict

Which files do you want to keep?

If you select both versions, the copied file will have a number added to its name.

☐ New Files
 ☐ Already existing files

moeraki bolders.png

 <input type="checkbox"/>	 <input type="checkbox"/>
April 20, 2020 10:20 AM	April 20, 2020 10:20 AM
78 KB	78 KB

If you select *New Files*, only the new file will be kept. If you select *Already existing files* only the existing file will be kept. If you select both, the new file will have a version number added to its name to indicate that it is a new version.

5. Deleting Documents from a Folder

All files and folders in Secure File Share will auto delete 90 days after creation.

Links to files and folders will expire 30 days after creation.

Or sooner if you they have been shared with a shorter lifespan. The expiration date of links cannot be extended.

To delete a file or folder

1. Click on the ellipsis menu (...) on the right of the file or folder
2. Select *Delete file/Delete folder*

Deleted files can be restored from the *Delete files* trash bin of the staff member sharing with you. Contact them immediately if you need a deleted item restored.

6. Need Help

You first contact for assistance is the Central Agency staff member sharing files with you.

From: [RCOICoVID-19 \[DPMC\]](#)
To: [Inquiry into COVID-19 lessons; Jenny Coleman-Walker](#)
Subject: The Department of the Prime Minister and Cabinet's response to the Inquiry's production order of 14 January 2025
Date: Friday, 7 March 2025 4:30:47 pm
Attachments: [image001.png](#)
[20250307 Cover Letter to RCOI - DPMC response to Production Order of 14 01 25\(4991191.1\).pdf](#)

[IN-CONFIDENCE]

Kia ora

The Department of the Prime Minister and Cabinet's response to the Inquiry's production order of 14 January 2025 has been submitted via secure file share and is now ready for viewing.

Please find attached our cover letter which describes how our response has been structured.

The files can be accessed via the URL link below, **until 6 April 2025**. For security reasons we will provide you with the password in a separate email

URL link:

s 9(2)(ba)(i)

Please do not hesitate to contact me if you have any questions.

Nāku noa, nā

Fiona Bawden ([she/her](#))

Advisor

COVID-19 Royal Commission of Inquiry
Strategy, Governance and Engagement Group
Department of the Prime Minister and Cabinet

P +64 (04) s 9(2)(a)

E fiona.bawden@dpmc.govt.nz

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DEPARTMENT OF THE
PRIME MINISTER AND CABINET
TE TARI O TE PIRIMIA ME TE KOMITI MATUA

7 March 2025

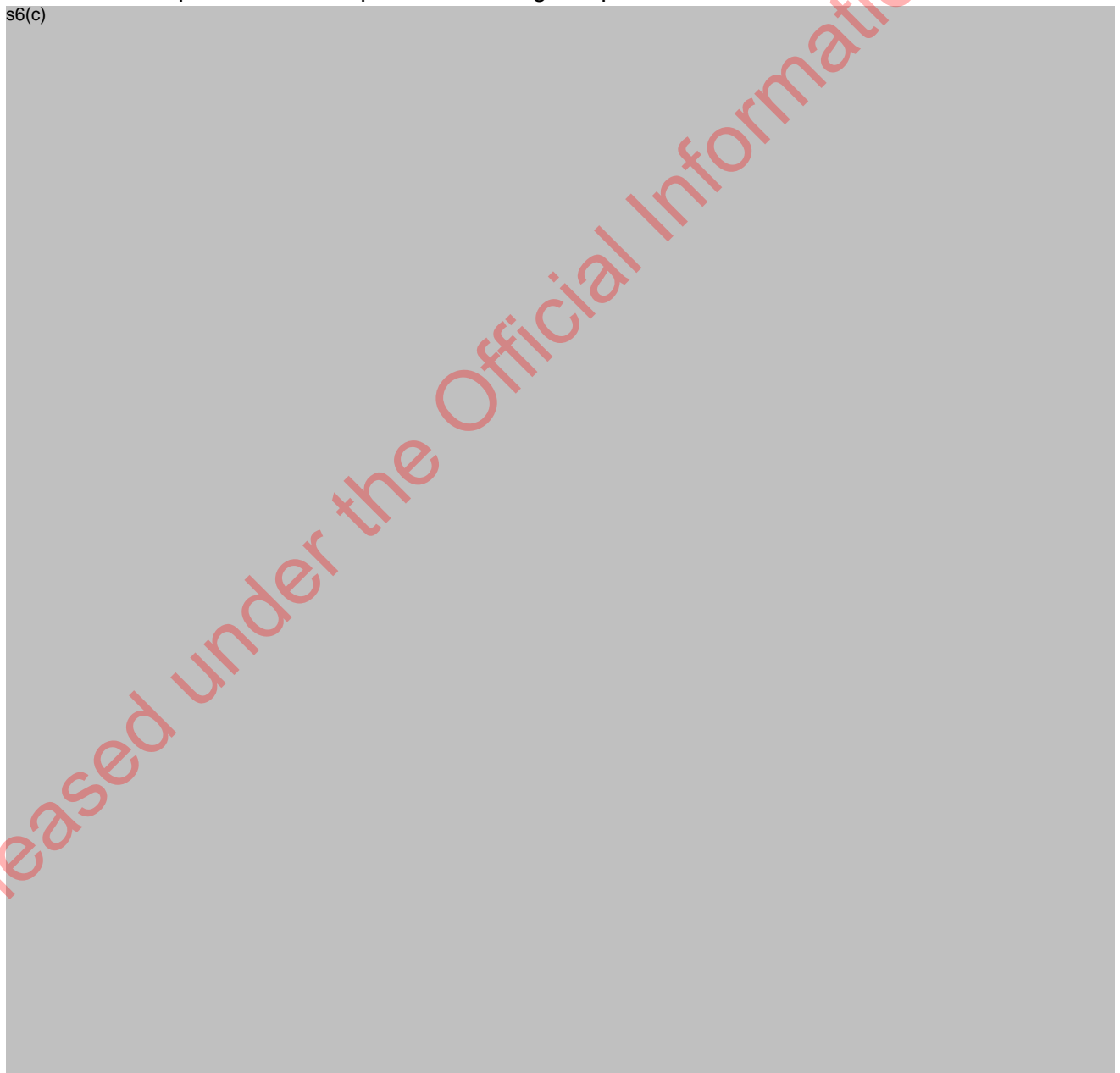
Grant Illingworth, KC
Chair of the Royal Commission of Inquiry (COVID-19 Lessons Learned)

By email: InquiryintoCOVID-19lessons@dia.govt.nz

Department of the Prime Minister and Cabinet (DPMC) Response to Production Order under section 20 of the Inquiries Act 2013

1. Please find attached DPMC's response to the production order dated 14 January 2025.
2. DPMC's response is made up of the following components:

s6(c)



s6(c)

As agreed, we will continue to work with the Inquiry regarding other materials it may require from DPMC, for example, s6(c)

Confidentiality

3. We note the Inquiry's Interim order in paragraph 18 of Phase Two: Minute 1 that pending completion of the report, access to submissions and/or evidence shall be limited to the commissioners and officers of the Inquiry except where limited disclosure is necessary to fulfil the purposes and objectives of the Inquiry.
4. We have not yet been able to complete consultation with the Leader of the Opposition with respect to Cabinet material and correspondence involving ministerial offices, and request that the material is treated confidentially until it is considered by his office. We ask to be consulted if there is any intention to disclose that information beyond the officers of the Inquiry as per paragraph 18.
5. We also seek confidentiality in respect of the identifying particulars of any individuals and in respect of any commercially sensitive information.

Legally privileged information

6. Legal professional privilege is asserted, and redactions have been made in documents over legally privileged material.
7. While we have made best endeavours to redact legally privileged materials within the documents, it is possible that some material may have been missed. DPMC does not wish to waive legal privilege in any legal advice and where that has been inadvertently missed in our redacting process, continues to assert privilege
8. We would be happy to answer any questions about our response and look forward to our ongoing discussions with the Secretariat to help support any further provision of information.

Certification

We attach details of the searches we undertook to identify information relevant to the production order and confirmation that we have complied with the order to the best of our ability.

Yours sincerely



Clare Ward
Executive Director
Strategy, Governance and Engagement

cc: rcoicovid-19@dpmc.govt.nz

From: [RCOI2](#)
To: [Clare Ward \[DPMC\]](#); [RCOI2](#)
Cc: [RCOICOVID-19 \[DPMC\]](#); [Annabel Ritchie \[DPMC\]](#)
Subject: RE: Meeting with DPMC on 12 March
Date: Tuesday, 11 March 2025 9:24:47 am
Attachments: [image002.png](#)
[image003.png](#)

Good morning Clare and thank you for your email. I will pass this on to our members who will be attending.

Best wishes

Bev Short (she/her)
Executive Assistant to Commissioners
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned

e bev.short@dia.govt.nz
covid19lessons.royalcommission.nz



From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>
Sent: Monday, March 10, 2025 4:51 PM
To: RCOI2 <RCOI2@dia.govt.nz>
Cc: RCOICOVID-19 [DPMC] <RCOICOVID-19@dpmc.govt.nz>; Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>
Subject: Meeting with DPMC on 12 March

[UNCLASSIFIED]

Kia ora Bev

Thank you for your email seeking a time for a meeting with DPMC on Wednesday 12 March from 1.30-2.30. We are happy to meet with the Secretariat but thought it may be useful to clarify the agenda for the meeting.

As noted in our hui last week, we focused DPMC's response to the production order on the s6(c) [REDACTED]. We are happy to work with the Secretariat regarding the Inquiry's priorities to ensure information provided to the Inquiry is useful for the Inquiry. We are also working our way through the identification of various s 6(c) [REDACTED] to determine scope and are happy to talk with the Secretariat on Wednesday s 6(c) [REDACTED].

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

Department of the Prime Minister and Cabinet

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E clare.ward@dpmc.govt.nz

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From: [Clare Ward \[DPMC\]](#)
To: [Andrew Sweet](#)
Cc: [RCOICoVID-19 \[DPMC\]](#); [Annabel Ritchie \[DPMC\]](#); [Rona Caird \[DPMC\]](#); [Bev Short](#); [Amanda Hyde](#)
Subject: RE: DPMC: Follow-up from meeting with the RCOI on 12 March
Date: Wednesday, 19 March 2025 12:55:48 pm
Attachments: [image001.png](#)
[image002.png](#)

Kia ora Andrew

Thanks for your response. Comments below in red.

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

Department of the Prime Minister and Cabinet

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E clare.ward@dpmc.govt.nz



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From: Andrew Sweet <Andrew.Sweet@dia.govt.nz>

Sent: Wednesday, 19 March 2025 11:39 am

To: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>

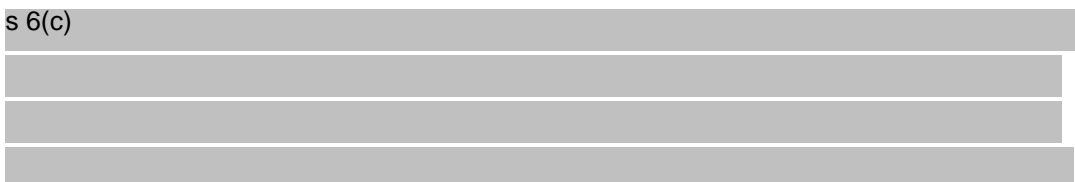
Cc: RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>; Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>; Bev Short <Bev.Short@dia.govt.nz>; Amanda Hyde <Amanda.Hyde@dia.govt.nz>

Subject: RE: DPMC: Follow-up from meeting with the RCOI on 12 March

Thanks for your email Clare.

Taking those various issues in turn:

- s 6(c)



s 6(c)

- Other DPMC materials: I've asked Amanda Hyde (cc'd in) to take the lead in reviewing the initial material you've provided and getting back to you regarding our priorities for the other material you might hold. **Thanks**
- Regular catchups: I've asked Bev to schedule a few more of these, and would like Amanda to join as well. (Bev can you add Amanda to the invite list?). I suspect by mid April we'll have worked through all of the issues we need to sort. And if we do so earlier we can cancel any we don't need. **Thanks. I'm on leave during April but Annabel will be available.**
- Attached correspondence: Thanks for those emails. They've been read and filed. **Thanks**

Hope that all sounds okay?

Thanks.

Andy

Andy Sweet (he/him)

Interim Executive Director/Head of
Delivery

Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned

e andy.sweet@dia.govt.nz
covid19lessons.royalcommission.nz



TE TIRA ĀRAI URUTĀ

**NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED**

From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>

Sent: Tuesday, 18 March 2025 2:42 pm

To: Andrew Sweet <Andrew.Sweet@dia.govt.nz>

Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; RCOICoVID-19 [DPMC] <RCOICoVID-19@dpmc.govt.nz>; Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>

Subject: DPMC: Follow-up from meeting with the RCOI on 12 March

You don't often get email from clare.ward@dpmc.govt.nz. [Learn why this is important](#)

[IN-CONFIDENCE]

Kia ora Andrew,

Thank you for your time on Wednesday, it was great meet you, Grant and Lydia in person.

s 6(c)

s 6(c)

s 6(c)

Other DPMC Materials

As agreed in our email of 21 February (attached), we have a range of other materials that the Inquiry may require.

We appreciate the Inquiry will have received significant volumes of material on 7 March. Once you have had an opportunity to review that, including the information provided by DPMC, we look forward to working with you regarding your priorities for the other materials that DPMC holds, that may be of interest to the Inquiry.

Regular catchups with the Secretariat

I note that the fortnightly catchups with the Secretariat have dropped off with Helen's departure. We have found these useful as a chance to check-in with the Inquiry – and to support us with information of priority to the Inquiry. If helpful, I can have my EA, Rona, work with Bev to reinstate these.

Correspondence with the Secretariat relating to DPMC scope s 6(c)

I have also attached the two emails with the Secretariat that we discussed at the meeting :

- Email which sets out the agreement for documents to be provided by 7 March 2025 (this was agreed between the Chair and Victoria Casey, KC (for DPMC))

- s 6(c) .

Thanks again for your time, we appreciate you making yourself available to meet with us in person.

Ngā mihi

Clare

Clare Ward (she/her)
Executive Director
Strategy, Governance and Engagement
Department of the Prime Minister and Cabinet

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From: [Rona Caird \[DPMC\]](#)
To: [Kathy Perreau \[DPMC\]](#)
Subject: FW: RCOI C-19: DPMC s 6(c), section 15 orders
Date: Monday, 24 March 2025 9:24:39 am
Attachments: [image001.png](#)
[image002.png](#)
[COVID-19 Inquiry DPMC and s 6\(c\).msg](#)

Mōrena Kathy,

I just want to just double check before I organise anything that it's ok for the inquiry s 6(c) this Thursday? Or looking to hold off for early next week?

Thanks
Ngā mihi,
Rona

From: Bev Short <Bev.Short@dia.govt.nz>
Sent: Monday, 24 March 2025 9:09 am
To: Rona Caird [DPMC] <Rona.Caird@dpmc.govt.nz>
Cc: Amanda Hyde <Amanda.Hyde@dia.govt.nz>
Subject: FW: RCOI C-19: DPMC and s 6(c), section 15 orders

Hi Rona

Hope you had a nice weekend.

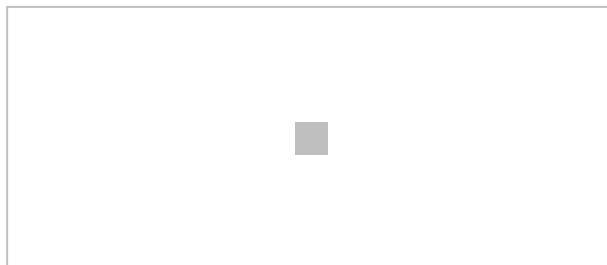
Clare has sent the below so my assumption is that all is set and we just need to know a time that our team can come down.

As mentioned previously, we have a team member travelling from Auckland, so I really need to book her flights.

Could you come back to me asap this morning with a confirmed time, etc?

Thanks so much.

Bev Short (she/her)
Executive Assistant to Commissioners
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e bev.short@dia.govt.nz
covid19lessons.royalcommission.nz



[illegible]

s 6(c)

s 6(c)

Ngā mihi

Clare

Clare Ward (she/her)

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Strategy, Governance and Engagement

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From: [Andrew Sweet](#)
To: [Clare Ward \[DPMC\]](#)
Cc: [RCOICOVID-19 \[DPMC\]](#); [Inquiry into COVID-19 lessons](#); [Annabel Ritchie \[DPMC\]](#); [Amanda Hyde](#); [Grant Illingworth](#)
Subject: RE: RCOI C-19: DPMC and s 6(c), section 15 orders
Date: Monday, 24 March 2025 11:32:29 am
Attachments: [image002.png](#)
[image003.png](#)

Thanks Clare.

I've have copied in Amanda from our team, who I want to take the lead on this DPMC material. Grateful if you can include her in all correspondence going forward.

s 6(c)
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

- [Redacted]
[Redacted]
- [Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]
[Redacted]

Thanks.

Andy

Andy Sweet (he/him)
Interim Executive Director/Head of
Delivery
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned



TE TIRA ĀRAI URUTĀ

NZ ROYAL COMMISSION COVID-19 LESSONS LEARNED

e andy.sweet@dia.govt.nz
covid19lessons.royalcommission.nz

From: Clare Ward [DPMC] <Clare.Ward@dpmc.govt.nz>

Sent: Friday, 21 March 2025 5:53 pm

To: Andrew Sweet <Andrew.Sweet@dia.govt.nz>

Cc: RCOICovid-19 [DPMC] <RCOICovid-19@dpmc.govt.nz>; Inquiry into COVID-19 lessons
<InquiryintoCOVID-19lessons@dia.govt.nz>; Annabel Ritchie [DPMC]
<Annabel.Ritchie@dpmc.govt.nz>

Subject: RCOI C-19: DPMC and s 6(c), section 15 orders

[IN CONFIDENCE]

Kia ora Andrew,

s 6(c)

-

-

-

-

-

-

s 6(c)

Ngā mihi

Clare

Clare Ward (she/her)

Executive Director

Strategy, Governance and Engagement

Department of the Prime Minister and Cabinet

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From: [Victoria Casey](#)
To: [Grant Illingworth](#)
Cc: [Annabel Ritchie \[DPMC\]](#); [Bev Short](#)
Subject: Re: s 6(c)
Date: Tuesday, 25 March 2025 2:13 pm

Kia ora Grant, and thanks for your time earlier.

s 6(c)




Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-**s 9(2)(a)** | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 25/03/2025, at 1:45 PM, Bev Short <Bev.Short@dia.govt.nz> wrote:

Good afternoon Victoria

Grant had meetings this morning and is now unavailable until 3pm or so.

I'm sure he will call you after 4pm.

Many thanks and best wishes

Bev Short (she/her)
Executive Assistant to Commissioners
Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned
e bev.short@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Tuesday, March 25, 2025 9:50 AM
To: Grant Illingworth <Grant.Illingworth@dia.govt.nz>
Cc: Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>
Subject: s 6(c)

Kia ora Grant

I've had a chat with Annabel about this, and am around today in the following times if any of those would suit for you to call?

- 11.30 - 12
- 12.30 - 1.30
- 4 onwards

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64 s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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From: [Grant Illingworth](#)
To: [Victoria Casey](#)
Cc: [Annabel Ritchie \[DPMC\]](#)
Subject: RE: s 6(c)
Date: Tuesday, 25 March 2025 9:56:50 am
Attachments: [image001.png](#)

Victoria,

I will ring you at 11:30 am.

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz



From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Tuesday, 25 March 2025 9:50 am
To: Grant Illingworth <Grant.Illingworth@dia.govt.nz>
Cc: Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>
Subject: s 6(c)

Kia ora Grant

I've had a chat with Annabel about this, and am around today in the following times if any of those would suit for you to call?

- 11.30 - 12
- 12.30 - 1.30
- 4 onwards

Ngā mihi

Victoria

From: [Clare Ward \[DPMC\]](#)
To: [Andrew Sweet](#)
Cc: [Inquiry into COVID-19 lessons](#); [RCOICoVID-19 \[DPMC\]](#)
Subject: Cancelling meetings with DPMC now that you are meeting regularly with Victoria Casey for the Crown departments
Date: Tuesday, 25 March 2025 7:55:33 pm
Attachments: [image001.png](#)

[IN-CONFIDENCE]

Kia ora Andrew,

Apologies for the late email, we are scheduled to meet with you tomorrow (Wednesday 26 March at 930am) via teams. However, we question if the meeting is still needed given the engagement of Victoria Casey, KC, by the Crown departments?

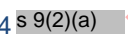
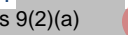
As you are aware, Victoria has recently been instructed to support the Crown departments with the Inquiry, and I understand regular meetings have been established between the Inquiry and Victoria. Given Victoria's recent engagement, we consider any DPMC matters could be discussed (if required) as part of the regular meetings between the Inquiry and Victoria relating to the all-of-government response.

We have appreciated the time you, and your team, have put into the meetings with us to date, and we look forward to continuing to work with you (as required) via Victoria.

Ngā mihi

Clare

Clare Ward (she/her)
Executive Director
Strategy, Governance and Engagement
Department of the Prime Minister and Cabinet

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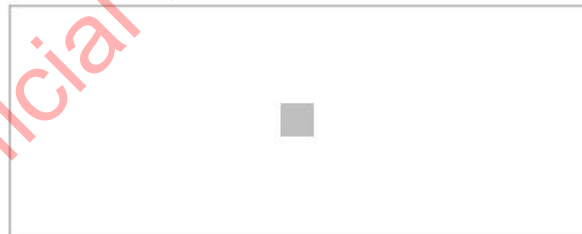
From: Grant Illingworth <Grant.Illingworth@dia.govt.nz>
Sent: Thursday, 27 March 2025 12:15 pm
To: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Cc: Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>
Subject: RE: s 6(c)

Thanks Victoria,

I think that will work as an interim arrangement. I will speak with the other Commissioners and come back to you this afternoon.

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz



From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Thursday, 27 March 2025 12:02 pm
To: Grant Illingworth <Grant.Illingworth@dia.govt.nz>
Cc: Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>
Subject: s 6(c)

Kia ora Grant, and thank you for your patience while we sorted this out.

s 6(c)

s 6(c) [Redacted]
[Redacted]

- [Redacted]
[Redacted]
- [Redacted]
[Redacted]
[Redacted]

[Redacted]
[Redacted]

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-s 9(2)(a) [Redacted] | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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Released under the Official Information Act 1982

From: [Grant Illingworth](#)
To: [Victoria Casey](#)
Cc: [Judy Kavanagh](#); [Anthony Hill](#)
Subject: s 6(c)
Date: Thursday, 27 March 2025 3:40:03 pm
Attachments: [image001.png](#)
[Letter to Victoria Casey KC 270325.pdf](#)

Victoria,

s 6(c)

[Redacted]

[Redacted]

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz



TE TIRA ĀRAI URUTĀ

NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED

From: [Victoria Casey](#)
To: [Grant Illingworth](#)
Subject: Re: S 6(c)
Date: Friday, 28 March 2025 9:59 am

Will do.

On 28/03/2025, at 9:58 AM, Grant Illingworth <Grant.Illingworth@dia.govt.nz> wrote:

Dear Victoria,

One of our team (Amanda Hyde) needs to make travel and other arrangements so I would be grateful if DPMC could confirm as soon as possible that Wednesday at 9:30 am will work for them.

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

Released under the Official Information Act 1982

From: [Victoria Casey](#)
To: [Grant Illingworth](#)
Cc: [Amanda Hyde](#)
Subject: Re: S 6(c)
Date: Friday, 28 March 2025 10:22 am

Kia ora Grant, I gather this has now been confirmed with Andrew, so Amanda should be good to make her arrangements now.

On 28/03/2025, at 9:58 AM, Grant Illingworth <Grant.Illingworth@dia.govt.nz> wrote:

Dear Victoria,

One of our team (Amanda Hyde) needs to make travel and other arrangements so I would be grateful if DPMC could confirm as soon as possible that Wednesday at 9:30 am will work for them.

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: [Andrew Sweet](#)
To: [RCOICOID-19 \[DPMC\]; Inquiry into COVID-19 lessons](#)
Subject: RE: DPMC: s 6(c)
Date: Friday, 28 March 2025 12:02:01 pm
Attachments: [image001.png](#)

Thanks Annabel.

That all sounds good.

s 6(c)

Thanks.

Andy

Andy Sweet (he/him)
Interim Executive Director/Head of
Delivery
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e andy.sweet@dia.govt.nz
covid19lessons.royalcommission.nz



From: RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>
Sent: Friday, 28 March 2025 10:16 am
To: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; Andrew Sweet <Andrew.Sweet@dia.govt.nz>
Subject: DPMC: s 6(c)

[IN-CONFIDENCE]

Kia ora Andrew,

s 6(c)

Many thanks,

Annabel
Annabel Ritchie
Chief Legal Advisor – Corporate, DPMC/NEMA

From: [Victoria Casey](#)
To: [Grant Illingworth](#)
Subject: Re: Inquiry
Date: Monday, 7 April 2025 2:02 pm

Kia ora Grant

s 6(c)




We are also working through the remaining issues raised in your latest letter, and I expect we can come back to you on a preliminary basis in a few days.

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-9-929292 | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

Confidentiality Notice: This email may contain information that is confidential or legally privileged. If you have received it by mistake, please reply promptly to that effect, remove this email and the reply from your system, and do not act on this email in any other way. Thank you.

On 7/04/2025, at 11:32 AM, Grant Illingworth <Grant.Illingworth@dia.govt.nz> wrote:

Victoria,

I understood you were going to get back to me by the end of last week on the matters we were discussing.

I would be grateful for a response by COB today please.

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: [Victoria Casey](#)
To: [Grant Illingworth](#)
Cc: [Nicolette Levy](#); [Danielle Kelly](#); [Andrew Sweet](#); [Bev Short](#); [Judy Kavanagh](#); [Anthony Hill](#)
Subject: Re: s 6(c)
Date: Thursday, 10 April 2025 10:41 am

s 6(c)

On 10/04/2025, at 7:58 AM, Victoria Casey <victoria.casey@cliftonchambers.co.nz> wrote:

Kia ora Grant

s 6(c)

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

Confidentiality Notice: This email may contain information that is confidential or legally privileged. If you have received it by mistake, please reply promptly to that effect, remove this email and the reply from your system, and do not act on this email in any other way. Thank you.

On 9/04/2025, at 8:35 PM, Grant Illingworth <Grant.Illingworth@dia.govt.nz> wrote:

Victoria,

s 6(c)

[Redacted content]

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Tuesday, 8 April 2025 12:11 pm
To: Grant Illingworth <Grant.Illingworth@dia.govt.nz>
Subject: s 6(c)

Kia ora Grant, and thank you for the discussion yesterday

s 6(c)

As set out in the letter, we are happy to engage further on any of these details: the aim is to achieve the required protections in the most practical way that works for the Inquiry.

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile: 64 s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

Confidentiality Notice: This email may contain information that is confidential or legally privileged. If you have received it by mistake, please reply promptly to that effect, remove this email and the reply from your system, and do not act on this email in any other way. Thank you.

From: [Nicolette Levy](#)
To: [Victoria Casey](#); ["Grant Illingworth"](#)
Cc: ["Danielle Kelly"](#); ["Andrew Sweet"](#); ["Bev Short"](#); ["Judy Kavanagh"](#); ["Anthony Hill"](#)
Subject: RE: s 6(c)
Date: Thursday, 10 April 2025 11:11:45 am
Attachments: s 6(c)

Kia ora Victoria

I will be writing to you formally, but note by way of advance notice that:

s 6(c)

[Redacted content]

[Redacted content]

Noho ora mai / Kind regards

Nicolette Levy KC

Capital Chambers, Level 14, 89 The Terrace, PO Box 10048, Wellington 6143
P 04 s 9(2)(a) F 04 934 0782 M s 9(2)(a) E nl@nicolettelevy.co.nz

<http://www.nicolettelevy.co.nz>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Thursday, 10 April 2025 7:58 am
To: Grant Illingworth <Grant.Illingworth@dia.govt.nz>
Cc: Nicolette Levy <nl@nicolettelevy.co.nz>; Danielle Kelly <danielle.kelly@bankside.co.nz>; Andrew Sweet <Andrew.Sweet@dia.govt.nz>; Bev Short <Bev.Short@dia.govt.nz>; Judy Kavanagh <Judy.Kavanagh@dia.govt.nz>; Anthony Hill <Anthony.Hill@dia.govt.nz>
Subject: Re: s 6(c)

Kia ora Grant

s 6(c)

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64 s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 9/04/2025, at 8:35 PM, Grant Illingworth <Grant.Illingworth@dia.govt.nz> wrote:

Victoria,

s 6(c)

s 6(c)

Regards,

Grant Illingworth KC
Chair of the Inquiry
Te Tira Ārai Urutā
NZ Royal Commission
Covid-19 Lessons Learned
grant.illingworth@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Tuesday, 8 April 2025 12:11 pm
To: Grant Illingworth <Grant.Illingworth@dia.govt.nz>
Subject: s 6(c)

Kia ora Grant, and thank you for the discussion yesterday.

As promised, attached please find a letter setting out the proposed arrangements and the proposed conditions to be reflected in the s 15 order.

As set out in the letter, we are happy to engage further on any of these details: the aim is to achieve the required protections in the most practical way that works for the Inquiry.

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64 s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

Confidentiality Notice: This email may contain information that is confidential or legally privileged. If you have received it by mistake, please reply promptly to that effect, remove this email and the reply from your system, and do not act on this email in any other way. Thank you.

From: [Nicolette Levy](#)
To: [Victoria Casey](#)
Cc: ["Andrew Sweet"](#); ["Bev Short"](#)
Subject: RE: s 6(c) - next steps
Date: Monday, 14 April 2025 2:03:37 pm
Attachments: s 6(c)

Hi Victoria

s 6(c)

Noho ora mai / Kind regards

Nicolette Levy KC

Capital Chambers, Level 14, 89 The Terrace, PO Box 10048, Wellington 6143
P 04 s 9(2)(a) F 04 934 0782 M s 9(2)(a) E nl@nicolettelevy.co.nz
<http://www.nicolettelevy.co.nz>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Monday, 14 April 2025 8:10 am
To: Nicolette Levy <nl@nicolettelevy.co.nz>
Cc: Andrew Sweet <Andrew.Sweet@dia.govt.nz>; Bev Short <Bev.Short@dia.govt.nz>
Subject: s 6(c) - next steps

Mōrena

s 6(c)

-
-
-

We look forward to hearing from you.

Ngā mihi

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64 s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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Released under the Official Information Act 1982

Out of Scope

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Wednesday, 16 April 2025 10:04 am
To: Annabel Ritchie [DPMC] <Annabel.Ritchie@dpmc.govt.nz>
Subject: Fwd: RCOI - undertakings (FYI)

For your records

Begin forwarded message:

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Subject: Re: RCOI - undertakings
Date: 16 April 2025 at 10:02:47 AM NZST
To: Nicolette Levy <nl@nicolletelevy.co.nz>
Cc: Grant Illingworth <Grant.Illingworth@dia.govt.nz>, Danielle Kelly
<danielle.kelly@bankside.co.nz>

Kia ora Nicolette

s 6(c)

[Redacted content]

From: [Nicolette Levy](#)
To: [Victoria Casey](#)
Cc: ["Grant Illingworth"; "Danielle Kelly"](#)
Subject: s 6(c)
Date: Wednesday, 16 April 2025 12:09:49 pm
Attachments: [2025-04-15 Letter to VC KC re s 6\(c\) .pdf](#)
[2025-04-16 Draft protocol - s 6\(c\) .docx](#)
[Dotcom v Attorney-General \[2019\] NZCA 412.pdf](#)

Kia ora Victoria

Please see letter attached, s 6(c) as discussed yesterday.

Noho ora mai / Kind regards

Nicolette Levy KC

Capital Chambers, Level 14, 89 The Terrace, PO Box 10048, Wellington 6143

P 04 s 9(2)(a) F 04 934 0782 M s 9(2)(a) E nl@nicolettelevy.co.nz

<http://www.nicolettelevy.co.nz>

Released under the Official Information Act 1982

From: [RCOICOVID-19 \[DPMC\]](#)
To: [Inquiry into COVID-19 lessons](#)
Subject: DPMC response to the Inquiry's letter of 2 April 2025
Date: Wednesday, 16 April 2025 4:37:14 pm
Attachments: [image001.png](#)
[Letter to RCoI re 2 April 2025 RCoI request FINAL\(5000747.5\).pdf](#)

[UNCLASSIFIED]

Kia ora

The Department of the Prime Minister and Cabinet's response to the Inquiry's letter of 2 April 2025 has been submitted via secure file share and is now ready for viewing.

The attached letter describes how our response has been structured and appendices contain lists of documents provided through the file share facility.

The files can be accessed via the URL link below, **until 15 May 2025**. For security reasons we will provide you with the password in a separate email.

URL link:

s 9(2)(ba)(i)

Other matters

Links to documents instead of copies

As requested in the Inquiry's letter of 14 April 2025, we have also provided PDF files for documents that were previously provided via URL links in our 7 March response. They appear in a folder labelled "PDF versions of public links". Some of these documents were referred to and footnoted in the body of our narratives. If that is the case, they will be found in a subfolder referencing the narrative. If the document was referenced an appendix, it will be in a subfolder that references the appendix.

Three documents provided 7 March 2025 s 6(c)

[Redacted content]

Please do not hesitate to contact us if you have any questions.

Nāku noa, nā

Kathy Perreau ([she/her](#))

Principal Advisor

COVID-19 Inquiry

Strategy, Governance and Engagement Group
Department of the Prime Minister and Cabinet

P +64 s 9(2)(a)

E Kathy.Perreau@dpmc.govt.nz

Email RCOICoVID-19@dpmc.govt.nz



Released under the Official Information Act 1982



16 April 2025

Grant Illingworth KC
Chair of the Royal Commission of Inquiry into COVID-19 Lessons Learned

By email: InquiryintoCOVID-19lessons@dia.govt.nz

Tēnā koe Grant

Response to request for information of 2 April 2025 from the Royal Commission of Inquiry into COVID-19 Lessons Learned (The Commission) - Phase Two

1. I am writing in response to the Commission's letter to Victoria Casey KC, dated 2 April 2025, requesting further information from the Department of the Prime Minister and Cabinet (DPMC). The response to the relevant 5 bullets is below.
2. We have provided appendices in the form of index tables that list the documents provided. Documents can be accessed through a secure site, for which a password will be sent separately.
3. The secure electronic folders will be available at:
<https://files.cass.govt.nz/s/BQ6kGqMCFgt6LAd> until 15 May 2025.

s 6(c)

s 6(c)

Confidentiality

We note the Inquiry's letter of 14 April 2025 in regard to confidentiality of material, and the expected process for disclosing documents in the interview and hearing process.

Legally privileged information

13. Legal professional privilege is asserted, and redactions have been made in documents over legally privileged material.
14. While we have made best endeavours to redact legally privileged materials within the documents, it is possible that some material may have been missed. DPMC does not wish to waive legal privilege in any legal advice and where that has been inadvertently missed in our redacting process, continues to assert privilege

We would be happy to answer any questions that you may have regarding this information.

Ngā mihi



Jude Ulrich
Acting Executive Director, Strategy Governance and Engagement

Appendices:

s 6(c)



Released under the Official Information Act 1982

From: [RCOICovid-19 \[DPMC\]](#)
To: [Inquiry into COVID-19 lessons](#)
Subject: DPMC secure file share
Date: Wednesday, 16 April 2025 4:40:28 pm
Attachments: [image001.png](#)

~~[IN CONFIDENCE]~~

Kia ora

Login for the secure file share:

- click on the URL link, and
- enter the password provided to log in

Password:

s 9(2)(ba)(i)

Any difficulties please let me know

Ngā mihi

Fiona

Fiona Bawden ([she/her](#))

Advisor

COVID-19 Royal Commission of Inquiry
Strategy, Governance and Engagement Group
Department of the Prime Minister and Cabinet

P +64 (04) s 9(2)(a)

E fiona.bawden@dpmc.govt.nz

The information contained in this email message is for the attention of the intended recipient only and is not necessarily the official view or communication of the Department of the Prime Minister and Cabinet. If you are not the intended recipient you must not disclose, copy or distribute this message or the information in it. If you have received this message in error, please destroy the email and notify the sender immediately.

From: [Inquiry into COVID-19 lessons](#)
To: [RCOICOID-19 \[DPMC\]](#)
Cc: [Inquiry into COVID-19 lessons](#)
Subject: RE: DPMC response to the Inquiry's letter of 2 April 2025
Date: Wednesday, 16 April 2025 5:48:41 pm
Attachments: [image002.png](#)
[image003.png](#)

Tēnā koe Kathy,

Thank you for your email.

I'm just acknowledging receipt of this email and the secondary email with the secure file share details.

We will let you know once we have accessed the system and retrieved the files

Have a lovely evening.

Ngā manaakitanga,

Janisha Nathu (she/her)
Senior Communications and
Engagement Advisor
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e janisha.nathu@dia.govt.nz
covid19lessons.royalcommission.nz


TE TIRA ĀRAI URUTĀ
**NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED**

From: RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>
Sent: Wednesday, 16 April 2025 4:37 pm
To: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>
Subject: DPMC response to the Inquiry's letter of 2 April 2025

[UNCLASSIFIED]

Kia ora

The Department of the Prime Minister and Cabinet's response to the Inquiry's letter of 2 April 2025 has been submitted via secure file share and is now ready for viewing.

The attached letter describes how our response has been structured and appendices contain lists of documents provided through the file share facility.

The files can be accessed via the URL link below, **until 15 May 2025**. For security reasons we will provide you with the password in a separate email.

URL link:

s 9(2)(ba)(i)

Other matters

Links to documents instead of copies

As requested in the Inquiry's letter of 14 April 2025, we have also provided PDF files for documents that were previously provided via URL links in our 7 March response. They appear in a folder labelled "PDF versions of public links". Some of these documents were referred to and footnoted in the body of our narratives. If that is the case, they will be found in a subfolder referencing the narrative. If the document was referenced an appendix, it will be in a subfolder that references the appendix.

Three documents provided 7 March 2025 s 6(c)

Please do not hesitate to contact us if you have any questions.

Nāku noa, nā

Kathy Perreau ([she/her](#))

Principal Advisor

COVID-19 Inquiry

Strategy, Governance and Engagement Group

Department of the Prime Minister and Cabinet

P +64 (4) s 9(2)(a)

E Kathy.Perreau@dpmc.govt.nz

Email RCOICoVID-19@dpmc.govt.nz

|

From: Nicolette Levy <nicolette.levy@dia.govt.nz>
Subject: RE: COVID19 Inquiry - s 6(c)
Date: 30 April 2025 at 11:19:57 AM NZST
To: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Cc: Danielle Kelly <Danielle.Kelly2@dia.govt.nz>, Grant Illingworth <Grant.Illingworth@dia.govt.nz>, Andrew Sweet <Andrew.Sweet@dia.govt.nz>

Kia ora Victoria

s 6(c)

Hoping for a quick chat about a small list of other matters also – is there a time that suits today?

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission

|

COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

????????????

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Tuesday, April 29, 2025 12:26 PM
To: Nicolette Levy <nicolette.levy@dia.govt.nz>
Cc: Danielle Kelly <Danielle.Kelly2@dia.govt.nz>; Grant Illingworth
<Grant.Illingworth@dia.govt.nz>
Subject: Re: COVID19 Inquiry - s 6(c)

Kia ora Nicolette

s 6(c)

Ngā mihi nui

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64 s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

Confidentiality Notice: This email may contain information that is confidential or legally privileged. If you have received it by mistake, please reply promptly to that effect, remove this email and the reply from your system, and do not act on this email in any other way. Thank you.

On 28 Apr 2025, at 10:15 AM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Hi Victoria

s 6(c)

[Redacted]

[Redacted]

Nicolette Levy KC

Counsel Assist

Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>

Sent: Monday, April 28, 2025 9:54 AM

To: Nicolette Levy <nicolette.levy@dia.govt.nz>

Cc: Danielle Kelly <Danielle.Kelly2@dia.govt.nz>; Grant Illingworth
<Grant.Illingworth@dia.govt.nz>

Subject: Re: COVID19 Inquiry - s 6(c)

s 6(c)

[Redacted]

[Redacted]

[Redacted]

s 6(c)

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 28 Apr 2025, at 9:13 AM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Hi Victoria

This email is a reply to your email Tuesday (4.43 pm), but sent from my DIA email address, which will be the one I use for RCOI correspondence from now on.

s 6(c)

Nicolette Levy KC

Counsel Assist

Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

<2025-04-24 Draft protocol - s 6(c).docx>

From: [Victoria Casey](#)
To: [Nicolette Levy](#)
Cc: [Grant Illingworth](#); [Danielle Kelly](#)
Subject: Re: s 6(c)
Date: Tuesday, 22 April 2025 4:44 pm

Kia ora Nicolette

s 6(c)

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 16/04/2025, at 12:09 PM, Nicolette Levy <nl@nicolettelevy.co.nz> wrote:

Kia ora Victoria

Please see letter attached, s 6(c).

Noho ora mai / Kind regards

Nicolette Levy KC

Capital Chambers, Level 14, 89 The Terrace, PO Box 10048, Wellington 6143

P 04 s 9(2)(a) F 04 934 0782 M s 9(2)(a) E nl@nicolettelevy.co.nz

<http://www.nicolettelevy.co.nz>

<2025-04-15 Letter to VC KC re s 6(c).pdf><2025-04-16 Draft protocol - s 6(c)>

From: [Victoria Casey](#)
To: [Nicolette Levy](#)
Cc: [Danielle Kelly](#); [Grant Illingworth](#)
Subject: Re: COVID19 Inquiry - s 6(c)
Date: Monday, 28 April 2025 12:19 pm

Thanks - I will get instructions and get back to you asap.

On 28 Apr 2025, at 10:15 AM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Hi Victoria

duplicate

[Redacted]

[Redacted]

Nicolette Levy KC

Counsel Assist

Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz

covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>

Sent: Monday, April 28, 2025 9:54 AM

To: Nicolette Levy <nicolette.levy@dia.govt.nz>

Cc: Danielle Kelly <Danielle.Kelly2@dia.govt.nz>; Grant Illingworth <Grant.Illingworth@dia.govt.nz>

Subject: Re: COVID19 Inquiry - s 6(c)

duplicate

[Redacted]

From: [Victoria Casey](#)
To: [Nicolette Levy](#)
Subject: Re: Call - now or after 3 suit?
Date: Wednesday, 30 April 2025 2:45 pm

Yes, after 4 works thanks.

On 30 Apr 2025, at 2:11 PM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

After 4? !

Nicolette Levy KC

Counsel Assist

Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Wednesday, April 30, 2025 1:32 PM
To: Nicolette Levy <nicolette.levy@dia.govt.nz>
Subject: Call - now or after 3 suit?

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-**s 9(2)(a)** | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 30 Apr 2025, at 11:19 AM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Kia ora Victoria

duplicate

[Redacted content]

[Redacted content]

[Redacted content]

[Redacted content]

[Redacted content]

From: [Nicolette Levy](#)
To: [Victoria Casey](#)
Cc: [Grant Illingworth](#); [Andrew Sweet](#); "[Danielle Kelly](#)"
Subject: s 6(c)
Date: Thursday, 1 May 2025 2:37:38 pm
Attachments: [image001.png](#)
s 6(c) [.docx](#)

Hi Victoria

s 6(c)

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz


TE TIRA ĀRAI URUTĀ
NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED

From: [RCOICOID-19 \[DPMC\]](#)
To: [Lydia Wadsworth](#)
Subject: RE: DPMC: s 6(c)
Date: Monday, 5 May 2025 11:40:51 am
Attachments: [image001.png](#)
[image002.png](#)

Kia ora

That's a good plan.

I'll make it part of my lunch time walk so expect me between 12.15 and 12.45.

Kathy

From: Lydia Wadsworth <Lydia.Wadsworth@dia.govt.nz>
Sent: Monday, 5 May 2025 10:49 am
To: RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>; Andrew Sweet <Andrew.Sweet@dia.govt.nz>
Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; Vic Johns <Vic.Johns@dia.govt.nz>
Subject: RE: DPMC: s 6(c)

Kia ora Kathy

I'm happy to meet you today at our offices at 79 Boulcott Street. My number is [s 9\(2\)\(a\)](#). If you call when you are in the lobby I can come and meet you and bring you upstairs.

I am in the office until 4pm today.

Lydia

Lydia Wadsworth
Chief Adviser
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
[e \[lydia.wadsworth@dia.govt.nz\]\(mailto:lydia.wadsworth@dia.govt.nz\)](mailto:lydia.wadsworth@dia.govt.nz)
covid19lessons.royalcommission.nz


TE TIRA ĀRAI URUTĀ
NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED

From: RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>
Sent: Monday, May 5, 2025 9:51 AM
To: Andrew Sweet <Andrew.Sweet@dia.govt.nz>
Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; Lydia Wadsworth <Lydia.Wadsworth@dia.govt.nz>; Vic Johns <Vic.Johns@dia.govt.nz>
Subject: RE: DPMC: s6(c)

You don't often get email from rcoicovid-19@dpmc.govt.nz. [Learn why this is important](#)

Thanks Andrew

Just need time and place and I can do today, if that suits.

Ngā mihi

Kathy Perreau ([she/her](#))

Principal Advisor

COVID-19 Inquiry

Strategy, Governance and Engagement Group

Department of the Prime Minister and Cabinet

P +64 (4) s 9(2)(a)

E Kathy.Perreau@dpmc.govt.nz

Email RCOICOVID-19@dpmc.govt.nz

From: Andrew Sweet <Andrew.Sweet@dia.govt.nz>

Sent: Monday, 5 May 2025 9:41 am

To: RCOICOVID-19 [DPMC] <RCOICOVID-19@dpmc.govt.nz>

Cc: Inquiry into COVID-19 lessons <InquiryintoCOVID-19lessons@dia.govt.nz>; Lydia Wadsworth <Lydia.Wadsworth@dia.govt.nz>; Vic Johns <Vic.Johns@dia.govt.nz>

Subject: RE: DPMC: s 6(c)

Hi Annabel.

Thanks for letting me know. I hadn't realised things were waiting on us. I'll get someone from the team to get back in touch to arrange a time / process.

We are very much looking forward to having access to them.

Andy

Andy Sweet (he/him)

Executive Director/Head of Delivery

Te Tira Ārai Urutā – NZ Royal Commission

COVID-19 Lessons Learned

e andy.sweet@dia.govt.nz

covid19lessons.royalcommission.nz

★
★
★
TE TIRA ĀRAI URUTĀ
**NZ ROYAL COMMISSION
COVID-19 LESSONS LEARNED**

From: RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>
Sent: Monday, 5 May 2025 7:54 am
To: Andrew Sweet <Andrew.Sweet@dia.govt.nz>
Cc: RCOICOID-19 [DPMC] <RCOICOID-19@dpmc.govt.nz>; Inquiry into COVID-19 lessons
<inquiryintocovid-19lessons@dia.govt.nz>
Subject: DPMC: s 6(c)

[IN CONFIDENCE]

Kia ora Andrew,

I hope you are well and have managed to grab a window seat today to enjoy the amazing Wellington sunshine!

s 6(c)

My colleague Kathy Perreau can deliver these to you at a suitable time – just let us know what works. We'd have to give the hard copy to yourself or one of the other persons named on the protocol, given the handling requirements agreed.

But, please let us know, and Kathy can deliver these to your offices (Kathy can be reached on this email).

Many thanks,

Annabel

Hei konā mai

Annabel Ritchie (she/her)

Chief Legal Advisor - Corporate

Strategy, Governance and Engagement Group

Department of the Prime Minister and Cabinet

P +64 (4) s 9(2)(a)

M +64 s 9(2)(a)

From: [Nicolette Levy](#)
To: [Victoria Casey](#)
Cc: [Andrew Sweet](#)
Subject: s 6(c)
Date: Wednesday, 7 May 2025 4:59:52 pm
Attachments: [image001.png](#)

Hi Victoria

I understand that the version with fewer people has come back s 6(c) – did you ever get instructions s 6(c) ?

Noho ora mai

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz



From: [Victoria Casey](#)
To: [Nicolette Levy](#)
Cc: [Andrew Sweet](#)
Subject: Re: s 6(c)
Date: Thursday, 8 May 2025 10:09 am

s 6(c)

On 8 May 2025, at 9:50 AM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

s 6(c)

Nicolette Levy KC

Counsel Assist

Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz

covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>

Sent: Thursday, 8 May 2025 9:41 am

To: Nicolette Levy <nicolette.levy@dia.govt.nz>

Cc: Andrew Sweet <Andrew.Sweet@dia.govt.nz>

Subject: Re: s 6(c)

Kia ora

s 6(c)

Ngā mihi

Victoria

On 8 May 2025, at 9:14 AM, Victoria Casey <victoria.casey@cliftonchambers.co.nz> wrote:

s 6(c)

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-9-929(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 7 May 2025, at 4:59 PM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Hi Victoria

s 6(c)

Noho ora mai

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned
e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

<Protocol Agreement between DPMC and Commission of Inquiry.docx>

From: [Victoria Casey](#)
To: [Nicolette Levy](#)
Cc: [Andrew Sweet](#)
Subject: Re: s 6(c)
Date: Friday, 9 May 2025 9:22 am

s 6(c)

Many thanks

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 8 May 2025, at 3:14 PM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

duplicate

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned
e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Thursday, 8 May 2025 10:10 am
To: Nicolette Levy <nicolette.levy@dia.govt.nz>
Cc: Andrew Sweet <Andrew.Sweet@dia.govt.nz>
Subject: Re: s 6(c)

s 6(c)

From: [Nicolette Levy](#)
To: [Victoria Casey](#)
Cc: [Andrew Sweet](#)
Subject: RE: s 6(c)
Date: Friday, 9 May 2025 11:20:48 am
Attachments: [image001.png](#)

Thanks for that.

s 6(c)

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission
COVID-19 Lessons Learned
e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz



From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Friday, 9 May 2025 9:22 am
To: Nicolette Levy <nicolette.levy@dia.govt.nz>
Cc: Andrew Sweet <Andrew.Sweet@dia.govt.nz>
Subject: Re: s6(c)

duplicate

Many thanks

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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From: [Victoria Casey](#)
To: [Nicolette Levy](#)
Cc: [Jennifer Hale](#); [Danielle Kelly](#); [Alastair Patrick](#)
Subject: Re: s 6(c)
Date: Friday, 27 June 2025 9:24:00 am

Thanks, we will get that underway and come back to you soon.

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64-s 9(2)(a) | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 27 Jun 2025, at 9:21 AM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Good morning Victoria

The request for further information s 6(c) is:

s 6(c)

- [Redacted]
- [Redacted]

Thanks very much.

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned
e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Nicolette Levy <nicolette.levy@dia.govt.nz>
Sent: Wednesday, 25 June 2025 11:20 am
To: Victoria Casey <victoria.casey@cliftonchambers.co.nz>

Cc: Jennifer Hale <jennifer.hale@crownlaw.govt.nz>; Danielle Kelly
<Danielle.Kelly2@dia.govt.nz>
Subject: RE: s 6(c)

OK, thanks.

s 6(c)

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission COVID-
19 Lessons Learned
e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>
Sent: Wednesday, 25 June 2025 10:54 am
To: Nicolette Levy <nicolette.levy@dia.govt.nz>
Cc: Jennifer Hale <jennifer.hale@crownlaw.govt.nz>; Alastair Patrick
<Alastair.Patrick2@dia.govt.nz>; Danielle Kelly <Danielle.Kelly2@dia.govt.nz>
Subject: Re: s 6(c)

Kia ora Nicolette

Thanks for your reply. s 6(c)

[Redacted content]

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

CLIFTONCHAMBERS

Mobile 64 **s 9(2)(a)** | Level 1, Solnet House, 70 The Terrace, PO Box 10731, Wellington, New Zealand

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On 23 Jun 2025, at 5:31 PM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Thank you Victoria

This is not a major point, and only a brief reference to there being a reason, and the broad reason for it, is required. To avoid the work and delay involved in a further set of requests, could we send you what we wish to include in the report? Given that there is an available open source, **s 6(c)**

s 6(c) if what we draft is sufficient for our purposes, and correct, then there may be no need for that work and delay.

Nicolette Levy KC

Counsel Assist

Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz

covid19lessons.royalcommission.nz

<image001.png>

From: Victoria Casey <victoria.casey@cliftonchambers.co.nz>

Sent: Monday, 23 June 2025 4:52 pm

To: Nicolette Levy <nicolette.levy@dia.govt.nz>

Cc: Jennifer Hale <jennifer.hale@crownlaw.govt.nz>; Alastair Patrick <Alastair.Patrick2@dia.govt.nz>; Danielle Kelly <Danielle.Kelly2@dia.govt.nz>

Subject: Re: **s 6(c)**

Kia ora Nicolette

I've sought instructions on this request, and with the information you have been able to provide (thank you) DPMC have identified that there is likely to be a good 'open' source for this material, **s 6(c)**

s 6(c)

Ngā mihi

Victoria

VICTORIA CASEY KC (she/her)

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On 18 Jun 2025, at 10:06 AM, Nicolette Levy <nicolette.levy@dia.govt.nz> wrote:

Good morning Victoria

s 6(c)

[Redacted content]

[Redacted content]

I look forward to hearing from you.

Nicolette Levy KC
Counsel Assist
Te Tira Ārai Urutā – NZ Royal Commission COVID-19 Lessons Learned

e Nicolette.Levy@dia.govt.nz
covid19lessons.royalcommission.nz

<image001.png>

From: [RCOICovid-19 \[DPMC\]](#)
To: inquiryintocovid-19lessons@dia.govt.nz
Subject: DPMC secure file share
Date: Friday, 1 August 2025 5:31:34 pm
Attachments: [image001.png](#)

[IN-CONFIDENCE]

Login for the secure file share:

- click on the URL link, and
- enter the password provided to log in

Password: s 9(2)(ba)(i)

Any difficulties, please let me know

Fiona Bawden ([she/her](#))

Advisor

COVID-19 Royal Commission of Inquiry
Strategy, Governance and Engagement Group
Department of the Prime Minister and Cabinet

P +64 (04) s 9(2)(a)

E fiona.bawden@dpmc.govt.nz

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As part of DPMC's response to the RCOI's 14 January 2025 request, we supplied you with the following^{s 6(c)}

s 6(c)

We suggest you replace the version you have with this version so as to ensure the s 6(c) is clear, should you need to refer to it.

The file was too large to share via email and you can access the corrected version via the URL link below, until 31 August 2025. For security reasons we will provide you with the password in a separate email.

URL link:

s 9(2)(ba)(i)

s 6(c)

Any questions please let me know

Ngā mihi

Fiona Bawden ([she/her](#))

Advisor

COVID-19 Royal Commission of Inquiry
Strategy, Governance and Engagement Group
Department of the Prime Minister and Cabinet

P +64 (04) s 9(2)(a)

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