



4 February 2026

Ref: OIA-2025/26-0433

Tēnā koe [REDACTED]

Official Information Act request relating to Atlas Network and affiliated organisations.

Thank you for your Official Information Act 1982 (the Act) request, which was received by the Department of the Prime Minister and Cabinet (DPMC) on 11 January 2026. You requested:

“Records, disclosures, contracts, safeguards, and authority statements relating to participation by New Zealand public officials, agencies, or agents in external policy networks, specifically including the Atlas Network and any affiliated organisations.

This request is not speculative. It concerns transparency, authority, and lawful governance obligations attaching to the exercise of public power.

1. Affiliations, participation, and disclosures

Please provide copies of all records held by your agency relating to:

1.1 Any formal or informal affiliations, memberships, participation, training, fellowships, conferences, workshops, or events involving Atlas Network or any Atlas-affiliated organisations.

1.2 Any disclosure statements, declarations of interest, conflict-of-interest forms, or ethics declarations made by Ministers, Associate Ministers, Ministerial advisors, senior officials, or policy staff referencing Atlas Network or affiliated organisations.

2. Funding, travel, and benefits

Please provide records of any public funding, reimbursement, sponsorship, or third-party payment relating to travel, accommodation, registration fees, honoraria, or training connected directly or indirectly with Atlas Network or Atlas-affiliated entities, including approvals or correspondence.

3. Policy influence and material reliance

Please provide any policy papers, briefings, Cabinet papers, aide-memoires, reports, or advice that cite, reference, rely upon, or were informed by material originating from Atlas Network or Atlas-affiliated organisations, including internal discussions assessing such influence.

4. Contracts, agreements, or understandings

Please provide copies of any contracts, MOUs, letters of understanding, cooperation agreements, or informal arrangements between your agency and Atlas Network or affiliated organisations, or confirmation if no such agreements exist.

5. Authority, safeguards, and jurisdiction

Please provide records explaining what safeguards ensure New Zealand law governs decision-making, prevent de facto authority by external policy organisations, and avoid presumption of consent or contractual obligation upon people in New Zealand.

6. If information is withheld

If any information is withheld, please identify the specific statutory ground relied upon, explain why partial release is not possible, and confirm whether redacted versions can be provided.

7. Timeframes and format

Please provide the information electronically where possible. If information is held across multiple business units, confirm this and provide a coordinated response.

Please contact the requester before refusing if refinement is required.

Clarification

This request does not allege wrongdoing. It seeks to verify authority, transparency, and lawful process where external policy networks intersect with public power. Failure to hold records confirming authority, safeguards, or disclosures will itself be material information.”

On 26 January, we notified you of our decision to partially transfer your request to the Department of Internal Affairs.

Attempts to refine scope

Under section 18B of the Act, DPMC has made two attempts to refine the scope of your request regarding information we may hold. On 15 January, you provided a clarification email (see Appendix 1), “to assist processing of the existing request.” You went on to state this clarification was “not [however] intended to narrow or replace the original request, which stands in full.”

In response, we reiterated our request for you to narrow the timeframe and/or provide a list of Atlas Network members or affiliates to enable us to search our records effectively. We asked for further refinement by 29 January, but no additional information was provided. As a result, we have limited our searches to mentions of the “Atlas Network.”

For your awareness, DPMC can only respond to your request with respect to information it holds.

Information to be refused

DPMC has carried out a search of its electronic databases, including our procurement and conflict of interest registers, for information where the words “Atlas Network” appear. No relevant documents have been identified and, as such, Parts 1-4 of your request, insofar as they concern the “Atlas Network,” are refused under section 18(e) of the Act as the information does not exist or, despite reasonable efforts to locate it, cannot be found.

After assessing the work required to research and collate information potentially in scope for the remainder of Parts 1-4 of your request, I have decided to refuse these under section 18(f) of the Act. The manual work required would impair efficient administration, and neither extending the timeframe nor imposing a charge would resolve this issue.

Part 5

This part of your request appears to seek information that spans the whole of Government and I do not believe it is made with due particularity. Additionally, this query may relate to Parliamentary Sovereignty, which is outside the scope of DPMC’s functions. You may wish to refer to section 15 of the Constitution Act 1986, which affirms Parliamentary Sovereignty in New Zealand, and section 27 of the New Zealand Bill of Rights Act 1990, which outlines the principles of natural justice and the right to judicial review.

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

A handwritten signature in blue ink, appearing to read 'Alan Cassidy', is centered on the page.

Alan Cassidy
Deputy Chief Executive, Corporate

Appendix 1 – Clarification email of 15 January 2026 from Tracy Lynch

Thank you for your email and for outlining the points on which clarification is sought.

This response is provided to assist processing of the existing request and is not intended to narrow or replace the original request, which stands in full.

1. Information held by DPMC

Yes, the request is directed to information held by DPMC, including but not limited to records created, received, used, or retained by DPMC in the course of its functions. Where information is not held, please confirm this expressly, as required under the Official Information Act 1982.

2. “Atlas Network” and affiliated entities

For clarity, the term “Atlas Network” refers to the organisation publicly known as The Atlas Network and entities described by Atlas itself as “partners,” “affiliates,” “grantees,” or “member organisations.”

The request is intentionally framed to capture:

- Any Atlas Network entity identified in DPMC records, and/or*
- Any Atlas-affiliated organisation referenced, cited, funded, consulted, or engaged with by DPMC, whether directly or indirectly.*

The request does not require DPMC to speculate or map the entire Atlas Network ecosystem independently. Rather, it seeks disclosure of what DPMC records already contain. If no such entities are identified in DPMC records, confirmation of that fact is requested.

3. Part 1 – Affiliations and participation

Your interpretation of Part 1.1 is accepted.

The request is limited to:

- Records held by DPMC relating to DPMC officials’ affiliations, participation, or attendance (formal or informal, official capacity) involving the Atlas Network or Atlas-affiliated organisations.*

No expectation is placed on DPMC to hold comprehensive records of third-party attendance beyond what is already held.

Regarding Part 1.2, we acknowledge your intention to transfer the ministerial adviser component to the Department of Internal Affairs.

4. Part 2 – Funding, travel, and benefits

This part of the request seeks records held by DPMC relating to funding, approvals, reimbursements, sponsorships, or third-party payments where DPMC officials were involved or where DPMC records such involvement.

If DPMC holds no such records, please confirm that explicitly.

5. Part 3 – Policy influence and material reliance

To assist processing, this part may be limited as follows without excluding other responsive material:

- Timeframe: 1 January 2015 to present*
- Document types:*
 - Briefing papers prepared by or for DPMC*

- Cabinet or Cabinet Committee papers where DPMC was the servicing or contributing agency
- Aide-memoires or internal policy advice held by DPMC

Where Cabinet material is transferred to another agency or Minister, please confirm the transfer and the basis for it.

6. Part 4 – “Informal arrangements”

For clarity, “informal arrangements” includes (without limitation):

- Non-contractual understandings
- Correspondence evidencing cooperation, coordination, or reliance
- Emails, meeting notes, or records indicating ongoing engagement absent a formal agreement

If no such records exist, confirmation of that fact is requested.

7. Part 5 – Authority, safeguards, and jurisdiction

This part of the request seeks DPMC-held records that explain:

- How New Zealand law is ensured to govern decision-making where external policy networks are involved
- What safeguards exist to prevent de facto authority, influence, or assumed consent arising from such involvement

If DPMC holds no records addressing these matters, that absence itself is responsive information and should be stated.

8. Clarification and timeframes

This clarification is provided to assist processing and should not be treated as a fresh request unless required by section 15(1AA). If DPMC considers any part of the request still insufficiently particularised, please identify the specific deficiency and the records category affected before refusing under section 18.