

Addendum



Due Diligence – Manurewa Marae Trust Board

This document has been prepared in response to feedback provided by Manurewa Marae and should be read in conjunction with the outcome of MSD's due diligence activities

<https://www.msd.govt.nz/documents/about-msd-and-our-work/newsroom/2025/due-diligence-report-manurewa-marae-trust-board-9-july-2024-draft.pdf>

Background

In June 2024 Te Kawa Mataaho – Public Service Commission launched an *Inquiry into the protection of personal information* (herein referred to as the inquiry¹). The inquiry focused on how government agencies protected people's personal information provided for the 2023 Census and COVID-19 vaccination purposes.

At the time the allegations were made public, MSD undertook due diligence activities looking at what arrangements it had with the Manurewa Marae Trust Board (the Marae). A copy of MSD's due diligence was provided to the inquiry on 9 July 2024.

In preparation for the release of the inquiry's report, MSD is intending to proactively release the outcome of its due diligence activities. A copy of the due diligence report was shared with the Marae on 25 November 2024 to identify any information that would not be appropriate to proactively release and, if requested, would be withheld under the Official Information Act 1982.

Representatives from MSD met with the CEO of the Marae on 9 December 2024 to explain the purpose of the Due Diligence review and seek feedback on the report.

Context for the due diligence review

Initially, MSD undertook the due diligence review to give itself comfort over the funding arrangements MSD had with the Marae. The scope of MSD's due diligence was extended to include sharing of information in light of the inquiry.

The due diligence review was a closed process, that is, it was MSD's assessment of its arrangements with the Marae. The content of the due diligence review is based on information held by MSD, including Te Kāhui Kāhu, and open-source information available relating to the Marae². Information informing the due diligence review was gathered between 4 June 2024 and 9 July 2024.

¹ For more information refer to: [Inquiry into the protection of personal information - Te Kawa Mataaho Public Service Commission](#)

² Open-source information was obtained from the Manurewa Marae website, Charities Commission, and media articles.

Feedback from the Marae

In response to the due diligence review, the Marae provided verbal feedback on the report during the meeting on 9 December 2024. Subsequently, feedback has also been provided on this Addendum. MSD appreciates this feedback.

As the information being proactively released is expected to be consistent with that provided to the inquiry, MSD has not reflected the Marae's feedback in the report itself. Instead, the Marae's feedback, and MSD's response, is outlined in the table below. This addendum is published alongside the due diligence report.

Manurewa Marae feedback on MSD due diligence review

Section	Page	Original wording in the due diligence report	Manurewa Marae feedback	MSD response
Context	2	In respect to the Marae, the content of this section is not repeated here.	In the "Context" section there is no reason to reproduce the unfounded allegations against the Marae. If the report is proactively released in anticipation of the PSC Inquiry – that is all that it needs to say. The repetition of unfounded allegations against the Marae, anywhere in the Report, is prejudicial to Manurewa Marae.	The "Context" section provides a brief outline of the allegations made, as these allegations, informed the scope of the Due Diligence review. The content of this section is based on publicly available information.
Background on Manurewa Marae – Manurewa Marae and its people	5	<p>2. The Marae describes itself as being a place where, Māori can rise tall in oratory, weep for their dead, house their guests, have their meetings, hakari, weddings and reunions, sing and dance, hold wananga, seminars, conferences and workshops and any other activities.</p> <p>3. Their focus is on providing support services, including care and counselling, to the community.</p>	<p>Manurewa Marae were not consulted about the drafting of this section and had no input into what is recorded there.</p> <p>During the hui on 9 December 2024 some specific requests were made to better reflect the way Manurewa Marae describes itself: see below.</p> <p>Replace bullet points 2 and 3 with the attached Manurewa marae brief (outlined below).</p> <p>Manurewa marae stands strong in its purpose of providing a cultural foundation for urban Maaori, other cultures, and the wider community. Manurewa marae has become the uukaipoo and tuurangawaewae for many.</p> <p>Our identity, Manurewatanga, is an intergenerational legacy, expressed through whanaungatanga, manaakitanga, and rangatiratanga. These time-honoured principles have remained steadfast and continue to guide the Marae, lighting our path as they have for generations.</p> <p>The marae needs their people and community in order to survive, strengthening kaainga to participate and invest their time in the Marae will ensure a strong cultural foundation for future generations. The marae is our last cultural bastion, to preserve and nurture te reo, oona tikanga, me oona aahuatanga. The Marae is a living breathing taonga born from the aroha of the people.</p> <p>Mā te aroha o te taangata, ka ora ai te taangata</p>	<p>The Due Diligence review was a closed process, drawing on engagement within, and information held by, MSD. This was supplemented with publicly available open-source information.</p> <p>The original outline of the Marae and its services is a summarised version of the Marae purpose as included in its annual return summary to the Charities Service.</p>

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Background on Manurewa Marae – Manurewa Marae and its people	5	MSD has incurred some expenditure on services with the Marae since its inception. However, engaging the Marae to deliver programmes and services on our behalf ramped up in financial year 2020/21 in response to the Covid-19 pandemic.	The suggestion that MSD has worked with Manurewa Marae since its inception is misleading - the Marae has not been contracting with MSD since its inception in the 1970s. Suggested edit: Update last bullet point - take out the words 'since its inception'.	The reference to 'since its inception' had been to infer that MSD had provided various types and levels of funding to the Marae since the Manurewa Marae Trust Board was incorporated in 2008. MSD does accept that funding increased, both in amount and regularity, during and since the Covid-19 pandemic.
Background on Manurewa Marae – Manurewa Marae and its people	5	Note 2 - There are two potential dates for the resignation of Takutai Moana Natasha Kemp from Manurewa Marae, being 6 September 2023, or following confirmation of election results on 3 November 2023.	Update end of note number 2 - change 6 September 2023 to 24 November 2023.	Based on information available at the time of the due diligence review, we were unable to confirm the exact date of Takutai Moana Natasha Kemp resignation from her role as Chief Executive of the Marae. MSD appreciates the confirmation.
MSD People and the Marae – Arrangements at the Marae	10	Over the course of this co-location arrangement, [name withheld], Case Manager was the primary MSD representative at the Marae during the period 12 October 2020 to 6 September 2023. In her absence, relief at the Marae was provided by: ❖ [name withheld], noting he no longer works for MSD and is currently the Employment Co-Ordinator for the Marae. ❖ Christmas relief was provided by: [name withheld], Case Manager; [name withheld], Case Manager; [name withheld], Case Manager; [name withheld], Work Broker.	Manurewa Marae does not recall any employee of the Marae including the Employment Co Ordinator providing any formal relief for MSD co located staff.	This information is based on MSD records and was included to provide context to the reader (internal) of those MSD kaimahi who may have been based at the Marae during the period of the co-location arrangement. For publication, individual names have been withheld to protect the privacy of natural persons, in line with section 9(2)(a) of the Official Information Act 1982.
Funding and contracting – Information provided to and shared by the Marae: Drivers licence programme	13	However, for the Driver Licence and Ready to Rent programme, individually identifiable client information was provided as part of the reporting from the Marae.	Reference to the fact that Manurewa Marae provided identifiable information to MSD as part of the Drivers Licence programme. Needs to be made clear this was a contractual requirement and request of MSD to provide the information in this way.	The provision of individually identifiable personal information is recognised later in the Due Diligence report as being a reporting requirement relating to both the Drivers Licence and Ready to Rent programmes. Acknowledgement of this requirement is considered in the section on the Drivers Licence and Ready to Rent programmes (from page 40) and within the Use of personal information section (from page 47).
Funding and contracting – Community Connection Service: Reporting against contract expectations	34	No reporting provided by the Marae	The Marae did provide some reporting throughout the period. The Marae alongside other partners/providers had challenges meeting variation and reporting requirements at times and this was communicated to MSD including COVID-19 impacts and limitations. MSD did not specifically raise the issue of lack of reporting with the Marae at the time.	The comment 'No reporting provided by the Marae' is specific to the reporting obligations outlined in the contract variation, for the period in which the contract variation was the latest agreement. In this case the comment relates to the expectation that weekly reporting would be provided to MSD during the period 20 December 2021 (date variation one took effect) to 1 March 2022 (date variation two took effect).

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				MSD accepts the impact of COVID-19 and alternative arrangements established, and this is acknowledged in the due diligence report. Furthermore, MSD acknowledges other reporting was provided which is outlined in the due diligence report.
Funding and contracting – various	38, 39 and 42	No reporting provided by the Marae	Same as above.	<p>Similar to the point above, the comments here are specific to the reporting obligations outlined in the contract, variation or grant agreement.</p> <p>MSD accepts the impact of COVID-19 and alternative arrangements established, and this is acknowledged in the due diligence report. Furthermore, MSD acknowledges other reporting was provided which is outlined in the due diligence report.</p>
Use of personal information	45	General point on maintaining personal information	Would like it noted that MSD have never raised any concerns with the Marae about its ability to meet the expectations for maintain personal information.	<p>The Due Diligence review was a factual exercise to, internally within MSD, seek comfort over its funding and information sharing arrangements with the Marae.</p> <p>MSD acknowledges that we have not raised any concerns with the Marae in relation to its ability to meet expectations for maintaining personal information either as part of MSD’s contract management or as a result of the Due Diligence review.</p>
Care in the community service – Information shared between MoH and MSD	55	Information shared with community providers in the request to provide support is limited to core individual client level data, being name, address, and contact information. This information was shared via email with community providers.	Same as above. MSD have never raised a question about Manurewa Marae compliance with expectations around the maintenance and use of personal information.	As recognised above, MSD acknowledges that we have not raised any concerns with the Marae in relation to its ability to comply with expectations around the maintenance and use of personal information either as part of MSD’s contract management or as a result of the Due Diligence review.