

26 February 2025

Spencer Jones
fyi-request-29624-8405d44f@requests.fyi.org.nz

Ref: OIA 118542

Tēnā koe Spencer

Official Information Act request: Ministry of Justice policies and procedures

Thank you for your email of 19 December 2024 to the Ministry of Justice (the Ministry) requesting information, under the Official Information Act 1982 (the Act), regarding Ministry policies and procedures. Specifically, you requested:

- 1. Please provide digital copies of the Ministry of Justice's policy documentation regarding integrity and conduct.*
- 2. Please provide digital copies of the Ministry of Justice's policy documentation for managing conflicts of interest, including any declaration which requires a person to identify any actual, perceived, or potential conflicts of interest.*
- 3. Please provide copies of the Ministry of Justice's policy documentation regarding managing an identified conflict of interest.*
- 4. A list of all current 2024 declared and undisclosed conflicts of interest among Ministry of Justice employees.*
- 5. A list of all the companies, individuals, and organizations that the Strategic Leadership Teamwork for or contract to as consultants or advisors or in any role other than their positions within the Ministry of Justice.*

On 5 February 2025, the Ministry contacted you to let you know that the time limit for response to your request was being extended under section 15A(1)(a) of the Act, and that a response would be sent to you on or by, 4 March 2025

In response to part 1 of your request, please find attached a copy of the Ministry's code of conduct. This has been released to you in full.

In response to part 2 of your request, please find attached a copy of the Ministry's conflict of interest policy. The Ministry does not currently have any formal guidance on how a conflict is managed, each declared conflict of interest should be considered on a case-by-case basis, according to the circumstances and the level of seriousness and sensitivity. If managers are unsure of the best way to manage a conflict, then the Risk and Internal Audit team will provide advice on an individual basis. In addition, all management plans and conflicts are reviewed by Risk and Internal Audit before being approved.

In response to part 3 of your request, please see below for a list of policies that make up the Ministry's integrity obligations as outlined by the Office of the Auditor General's Public Sector Integrity Framework and the Public Service Commission's Standards of Integrity and Conduct.

- Bullying, harassment, and sexual harassment policy
- Business and sensitive expenditure policy
- CCTV policy
- Code of conduct
- Conflict of interest policy
- Disciplinary process
- Equal employment opportunities policy
- Fraud and corruption policy
- Gifts policy
- Koha policy
- Information gathering model standards
- Legislative compliance policy
- Official information act policy
- Performance management policy
- Policy framework
- Privacy & personal information policy
- Privacy & personal information guidelines
- Protected disclosure policy
- Recruitment policy
- Responsible use policy
- Risk and assurance committee charter
- Staff securities guidelines
- Sensitive expenditure policy
- Transparency statement
- Travel policy
- Travel guidelines
- Wellbeing strategy
- Wellbeing support policy

In response to part 4 of your request, please see below for all the declared conflicts received during the 2024 calendar year by category.

Declared conflicts at the Ministry of Justice received 2024.

Other	70
Political	1
Professional	37
Secondary Work	14
	234

Whanau /
Relationship

Notes:

- Political - I have political involvement that could conflict with my duty to act in a politically neutral manner, or my political involvement could appear to compromise my ability to make decisions in the best interests of Te Tāhū o te Ture. e.g. Have family relationships, acquaintances or friendships with a member of government or opposition party.
- Professional - I have professional contacts with other organisations, association and trusts. e.g. Volunteer for an organisation that has interactions with the Ministry.
- Secondary work - I already have or I am applying to undertake another role which is secondary work (refer to the Secondary Work policy) and there may be a conflict.
- Whanau / Relationship - I have family relationships, acquaintances or friendships which could be perceived as a conflict. e.g. You have a family member, friend or acquaintance that is appearing in the court where you work.
- Other - I have a personal interest that does not fit in any of the above categories, but I believe this interest may raise a conflict or potential conflict of interest with Te Tāhū o te Ture

In response to part 5 of your request, I can confirm that two members of the Ministry's Strategic Leadership Team hold interests in a private capacity in three companies. I can confirm that there is no cross over between these companies and the Ministry and there have been no payments made to these companies by the Ministry in the last 3 years.

As these companies and roles are held in a private capacity, the Ministry is not be able to provide a list of the Strategic Leadership Team members or the companies as this would be deemed personal information.

If you require any further information, please contact Social Media and Media Manager Joe Locke at media@justice.govt.nz

Please note that this response, with your personal details removed, may be published on the Ministry website at: [Official Information Act responses | New Zealand Ministry of Justice](#)

If you are not satisfied with this response, you have the right to make a complaint to the Ombudsman under section 28(3) of the Act. The Office of the Ombudsman may be contacted by email to info@ombudsman.parliament.nz or by phone on 0800 802 602.

Nāku noa, nā



Sheridan Smith
General Manager, Strategy, Performance & Relationships