GCDO Circular: Roles and responsibilities under the Whole-of-Government Direction to Centralise Digital Investment and Procurement Decision Making 2026

Issued by	Government Chief Digital Officer (GCDO)
Authority	This Circular is established under the authority of the Whole-of-Government Direction to Centralise Digital Investment and Procurement Decision Making 2026
Applies to	Crown entities subject to the Direction from their applicable commencement date
Status	Version 1.0. Approved by Ministers and issued on 30 October 2026
Review	This Circular will be reviewed in mid-2027 and updated as required

1. Purpose and outcomes

This Circular sets out the accountability, decision-making and operating arrangements that support implementation of the Whole-of-Government Direction to Centralise Digital Investment and Procurement Decision Making 2026 (the Direction). It explains who does what, who decides what, and how the Government Chief Digital Officer's (GCDO) digital system leadership role operates alongside existing statutory, governance, investment, funding and procurement arrangements.

2. Scope and application

This Circular applies to strategically significant digital investments by entities subject to the Direction. Strategic significance will be determined by an investment's contribution to the Digital Government Target State and wider government digital priorities. This may include investments that fall within existing board or chief executive delegations, existing financial approval thresholds, or are funded through baselines, levies or other non-Budget funding sources.

Operational policies and processes developed by entities to implement the Direction must remain consistent with the Direction, this Circular and any applicable standards or further circulars issued under the Direction. References in this Circular to the Minister for the Public Service and Digitising Government include any successor Minister with responsibility for digital government or administration of the Direction.

3. Statutory context and limits

Nothing in this Circular alters, limits or replaces:

- the statutory functions, powers, duties or obligations of an entity;
- the governance responsibilities and duties of an entity board;
- the management responsibilities of an entity chief executive;
- the responsibilities and decision-making authority of responsible Ministers, shareholding Ministers and Cabinet; and

- the responsibilities and decision-making authority of other system leads within the investment and procurement systems.

This Circular must be read consistently with the Crown Entities Act 2004, the Companies Act 1993 where applicable, each entity's governing legislation and all other relevant legal and regulatory requirements.

This Circular does not apply if, to the extent that, its application would contravene section 113 of the Crown Entities Act 2004.

4. System leadership for digital, investment and procurement

Section 56 of the Public Service Act 2020 enables the Public Service Commissioner to designate a public service chief executive as a system leader to lead and coordinate best practice in a subject matter area across all or part of the state services. System leaders are responsible to the appropriate Minister for achieving agreed outcomes and may also exercise powers conferred by Cabinet or Minister decisions, such as the Direction.

4.1 Digital investment and procurement system leadership

The functional Chief Executive for Digital Government is the digital system lead, holds the role of GCDO and leads the Government Digital Delivery Agency (GDDA). The GCDO is responsible for leading digital system outcomes across government and exercising functions conferred through Cabinet decisions, Ministerial decisions and other applicable instruments, including the Direction. The GCDO also leads the use of data in government for digital service delivery. The GCDO is responsible to the Minister for the Public Service and Digitising Government for agreed outcomes. The GCDO is responsible to the Minister for the Public Service and Digitising Government and the Minister of Finance (joint Ministers) for implementing the Direction.

4.2 Investment system leadership

The chief executive of the Treasury is the investment system lead. The Treasury administers the Investment Management System and the Government's Budget. The responsible Minister is the Minister of Finance.

4.3 Procurement system leadership

The chief executive of MBIE is the procurement system lead. New Zealand Government Procurement (NZGP), a business unit within MBIE, administers the Procurement Functional Leadership Whole-of-Government Direction 2014 and related procurement settings, guidance, tools and templates. The responsible Minister is the Minister for Economic Development.

4.4 Information security system leadership

The chief executive of the Government Communications Security Bureau is the information security lead and holds the role of Government Chief Information Security Officer (GCISO). The GCISO leads the strategic direction and prioritisation of the Government's approach to information security and sets information security standards and requirements for government.

4.5 Data system leadership

The chief executive of Statistics New Zealand is the system lead for the statistical use of data and holds the role of Government Statistician and Government Chief Data Steward (GCDS). Alongside the GCDO, the Government Statistician/GCDS co-leads the stewardship of system-wide approaches to the management and use of data across government, with a focus on data for statistical purposes.

5. Digital investment system planning

The GCDO leads the development and maintenance of a rolling three to five-year System Digital Investment Plan for strategically significant digital investment.

The System Digital Investment Plan is informed by the digital investment strategies of entities and departments but is not an aggregation of those strategies and does not constitute approval of expenditure, funding, procurement activity, business cases or investment proposals. It complements wider investment system planning, prioritisation and contestability but has a distinct purpose. Existing funding approval and assurance requirements continue to apply.

The System Digital Investment Plan outlines system-wide priorities, opportunities, risks, dependencies and sequencing requirements to enable the Digital Government Target State and wider government digital priorities. It supports early, informed, coordinated and ongoing advice about which investments should be progressed, accelerated, reshaped, consolidated or deferred, with that advice informing Budget, Cabinet, investment and procurement decisions early enough to make a difference.

Strategic significance is determined by investment's contribution to the Digital Government Target State and wider government digital priorities.

The GCDO will use clear criteria and assumptions, which will be informed by data where reasonably practicable, to identify system-wide opportunities, risks, dependencies, capability requirements and delivery constraints.

5.1 Annual inputs from entities

The GCDO will issue annual guidance by 28 February each year describing the application of strategically significant digital investment for the relevant planning cycle and the corresponding information requirements to support development of the rolling three to five-year System Digital Investment Plan.

Two inputs are required from entities:

- **Digital investment strategies:** These set out an entity's intended strategically significant digital investments, including priorities, dependencies, risks and anticipated outcomes over a rolling three to five-year period. This may include investments funded through baselines and other funding sources.
- **Digital investment data:** Entities must provide annual investment intentions and related data to the GCDO. This includes information on current and planned digital expenditure, projects, products, services and capabilities to support system stewardship, performance monitoring and investment analysis.

Entities must provide the required information to the GCDO by 30 June each year and engage with the GCDO in relation to those investments as reasonably required, particularly between July and October.

Information requirements will be proportionate and, where practicable, aligned with existing Investment Management System, Budget and procurement requirements to minimise compliance burden and support information being collected once and reused where possible.

The GCDO may request additional information at any time of the year, in accordance with the Direction and where reasonably required to perform the GCDO's functions under the Direction.

5.2 The annual process to support digital system investment planning, prioritisation and contestability

The key steps and timeframes are as follows:

Timeframe	Activity
By 28 February	GCDO issues annual guidance and templates to entities.
By 30 June	Entities submit their board-approved digital investment strategies and digital investment information.
July to October	Entities engage with the GCDO on priorities, dependencies, sequencing and applicable pathways as required.
Ongoing	The GCDO provides early, informed and coordinated advice to Ministers and Cabinet. Entities may need to provide additional information requested by the GCDO throughout the year and/or may be required to engage with other entities or agencies in relation to their investment planning. This will be notified in advance where possible.

6. Roles and responsibilities

6.1 Minister for the Public Service and Digitising Government and the Minister of Finance (joint Ministers)

Joint Ministers are responsible for:

- giving the Direction to entities in accordance with the Crown Entities Act 2004;
- overseeing the implementation of the Direction;
- approving the policy for GCDO issued standards and circulars issued under the Direction; and
- considering, with the relevant responsible Minister or shareholding Minister where appropriate, matters under the Direction that cannot be resolved by an entity, the GCDO or another system lead.

6.2 Responsible Minister or shareholding Ministers

Responsible Ministers or shareholding Ministers where appropriate are responsible for:

- exercising portfolio or ownership responsibilities on behalf of the Crown;
- setting expectations for individual entities that are consistent with the Direction and this Circular;
- overseeing entity performance and stewardship;
- approving investment and expenditure within their authority;
- holding boards accountable for delivering statutory functions, objectives and agreed outcomes; and
- consulting joint Ministers on a matter escalated by an entity in relation to the Direction where they consider it appropriate to do so.

6.3 Cabinet

Cabinet is responsible for:

- overseeing the Government's investment system; and
- making investment and funding decisions reserved for Cabinet or above Ministerial delegations.

6.4 Government Chief Digital Officer

The GCDO is responsible for:

- leading the development and coordinated implementation of the Digital Government Target State;
- developing and maintaining the rolling three to five-year System Digital Investment Plan;

- supporting system-wide planning, prioritisation and contestability, including identifying opportunities for reuse, aggregation, common capabilities, system operational resilience and strategic sourcing;
- making determinations under the Direction where it may be relevant to do so;
- providing digital investment and procurement advice to Ministers and Cabinet;
- working with entities, departments, monitoring departments and system leads as and where needed to support coherent system settings and investment outcomes;
- monitoring implementation of and compliance with the Direction; and
- reporting to joint Ministers and advising them as required.

6.4.1 GCDO determinations

The GCDO may make a determination, as authorised by the Direction, about:

- the digital products, services or common capabilities on the all-of-government procurement list that an entity must use where the relevant product, service or capability substantially meets the entity's need; and
- the investment or procurement pathway an entity must follow to deliver an investment.

A determination may specify the product, service, capability or pathway an entity must follow but does not transfer responsibility for the entity's investment, expenditure, procurement activities or statutory functions to the GCDO. The entity remains responsible for decisions and actions within its authority, including complying with applicable statutory, governance, funding, assurance and procurement requirements.

The GCDO must communicate a determination that affects an entity in writing, in a timely manner and provide sufficient information to enable the entity to understand the basis for the determination and consider its implications in accordance with its own statutory processes.

6.4.2 Standards and circulars

The GCDO may issue standards and circulars under the Direction, subject to joint Ministers approving the policy. The GCDO will endeavour to consult affected entities on the draft policy, including potential impacts, implementation considerations and timeframes. Consultation periods and methods may vary but will typically allow at least 10 working days where practicable or longer for substantive policy changes.

6.4.3 GCDO information requests

The GCDO collaborates with other system leads to align and minimise information requests. The GCDO may make additional routine or non-routine information requests in accordance with the Direction. A request for information must explain how the information will be used and provide a reasonable timeframe for the entity to respond, which is proportionate to the information being sought and whether it is considered a routine or non-routine information request.

6.5 Crown entities subject to the Direction

Entities are individually accountable to their responsible Minister or shareholding Minister for performance, stewardship and the exercise of statutory functions. They are subject to Parliamentary scrutiny through the public accountability framework.

An entity under this Circular is responsible for:

- initiating, planning and delivering investments;
- ensuring digital investment and procurement contributes to the Digital Government Target State and is consistent with applicable digital investment and procurement principles;

- submitting a board-approved rolling three to five-year digital investment strategy and required digital investment data by 30 June each year and in accordance with the issued guidelines;
- engaging with the GCDO as reasonably required, particularly in July-September;
- complying with GCDO determinations subject to the statutory context and limits set out in section 3, which may include working with other entities and/or departments to support digital system investment outcomes;
- complying with standards and circulars issued under the Direction;
- providing other reasonably requested information for monitoring, assurance and compliance purposes; and
- ensuring investment and procurement activities remain consistent with applicable Treasury requirements and NZGP requirements.

Entities should seek clarification promptly from the GCDO in relation to a matter where requirements are unclear.

6.6. Entity board

The board is accountable for the governance, performance, stewardship and statutory obligations of the entity. An entity board subject to the Direction is responsible for:

- overseeing significant digital risks, resources and major investments;
- ensuring the entity has appropriate governance and controls to comply with the Direction;
- approving the rolling digital investment strategy before it is submitted to the GCDO; and
- holding the chief executive accountable for implementation in accordance with Minister decisions or a GCDO determination, subject to the statutory context and limits set out in section 3.

6.7 Entity chief executive

The chief executive is responsible to the board for managing the entity. A chief executive of an entity under the Direction is responsible for:

- ensuring the entity complies with the Direction and any standards or circulars issued under it;
- implementing decisions and determinations made under the Direction, and any standards or circulars issued under it, subject to the statutory context and limits set out in section 3; and
- managing the entity's engagement with the GCDO, including responding to information requests and meeting applicable reporting requirements.

6.8 Government Digital Delivery Agency

The Government Digital Delivery Agency (GDDA) is a business unit within the Public Service Commission and supports and acts under the authority of the GCDO. The GDDA acts under the authority of the GCDO when performing functions and delivering responsibilities assigned to the GCDO under the Direction.

6.9 The Treasury

The Treasury collaborates with the GCDO and, where relevant, supports:

- alignment between digital investment settings and investment and funding settings;
- coordinated advice on strategically significant digital investments; and
- reducing unnecessary duplication and administrative burden for entities.

6.10 New Zealand Government Procurement

New Zealand Government Procurement (NZGP) is a business unit in MBIE. NZGP collaborates with the GCDO and, where relevant, supports:

- alignment between digital procurement settings and wider procurement settings;

- coordinated advice on digital procurement; and
- reducing unnecessary duplication and administrative burden for entities.

6.11 Government Chief Information Security Officer

The GCISO collaborates with the GCDO and, where relevant, supports:

- early identification of system-level information security and cyber security risks and dependencies;
- alignment with government information security requirements and priorities; and
- coordinated advice on investments with significant security, cyber security or resilience implications.

6.12 Government Chief Data Steward

The GCDS collaborates with the GCDO and, where relevant, supports:

- early identification of system-level data opportunities, risks and dependencies;
- alignment with government data settings and priorities; and
- coordinated advice on investments with significant cross-government data implications.

6.11 Monitoring departments

Monitoring departments support responsible and shareholding Ministers to exercise their oversight responsibilities. Monitoring departments collaborate with the GCDO and, where relevant, support entity alignment with the Digital Government Target State, and their contributions towards it, by advising Ministers on setting expectations consistent with the Direction and this Circular.

7. Implementation arrangements

7.1 Digital investments already in progress

Subject to further updates under the Direction, an entity already progressing a digital investment should continue to follow existing investment and procurement policies and processes that apply to that investment.

8. Partnership

Implementation of the Direction relies on early and ongoing engagement, collaboration and good faith between stakeholders to support effective digital system outcomes for New Zealand.

9. Escalating matters

The GCDO and entities should seek to identify and resolve issues early through ongoing engagement. Matters raised should be specific and supported by sufficient information to enable case-by-case consideration.
If an entity does not support a GCDO determination that directly affects it or has concerns about a specific matter under the Direction, including a specific matter related to the circular or standard issued under it, the entity should raise the matter promptly with the GCDO. The entity must explain the basis for its concern, including any relevant statutory obligation, Ministerial expectation, directors' duty, or delivery, operational or financial risk.

The GCDO and the entity must endeavour to reach a mutually acceptable outcome. If the matter cannot be resolved, the entity may escalate it to its responsible Minister or shareholding Minister after informing the GCDO. The GCDO may also escalate the matter to joint Ministers. Joint Ministers may consider the matter with the relevant responsible Minister or shareholding Ministers where appropriate.

Escalation does not suspend any applicable statutory duty, approval requirement or legal obligation.

10. Communication

The Direction, this Circular and all GCDO issued standards and circulars will be published on www.digital.govt.nz. The GCDO will issue communication to entities via the GCDO inbox at gcdo@gdda.govt.nz and will also write to board chairs and chief executives from time to time.

11. Review and updates

The GCDO will review this Circular in mid-2027 and may update it as required to reflect changes to the Digital Government Target State, government priorities, wider system changes and implementation experience.

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VERSION 1.0	30 October 2026