



REVIEW OF THE BIOMETRIC PROJECTS

BIOMETRIC CAPABILITY UPDATE, BCU AND IPE
PROJECTS

Greg James

Privacy of natural persons

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Document Control Sheet

Contact for Queries and Proposed Changes

If you have any questions regarding this document:

Contact: Greg James

Title: Management Consultant

Phone: Privacy of natural persons

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Introduction

This review involved the examination of more than 400 documents, spanning activity from 2018 onward, and 43 interviews, including several follow-up sessions to verify and clarify key events. A full list of documents and interviewees is included in Appendix 1.

All interviews were conducted on a non-attributable basis to support open and candid discussions. While no individual comments are quoted, consistent themes and patterns emerged across interviews. These were tested against the available documentation to determine the core findings that inform this report.

Given the duration of the programme, understanding the sequence of events was essential. A verified timeline is presented in Appendix 2 and has been fact-checked by the BCU project team to ensure accuracy.

The project began within Immigration New Zealand (INZ) and subsequently transferred to the Digital, Data & Insights Group (DD&I) as part of the 2022 organisational restructure. In its later stages, budget responsibility moved to the Corporate and Digital Shared Services (CDSS) function. For clarity and simplicity, this report primarily refers to INZ throughout.

Executive Summary

The Biometric Capability Update (BCU) project was initiated to modernise Immigration New Zealand's (INZ) Identity Management (IDme) solution by upgrading the NEC biometric algorithm, improving system efficiency, and replacing the "In-Person Enrolment (IPE)" component. The original IDme platform, implemented in 2016, was costly, complex, and reliant on an algorithm dating back to 2012, prompting two business cases in 2018–2019 for BCU and IPE. Both cases followed the Treasury Better Business Case format and process; however, both cases were overly optimistic and lacked the detailed analysis required to support decision-making.

Following the onset of Covid-19, INZ faced significant financial pressures that accelerated a major change in direction. In August 2020, Change Request 2 shifted the initiative from an upgrade to a full replacement of the IDme system using NEC's "out-of-the-box" Multimodal Biometric Identification Solution (MBIS)" and Reveal solutions. This shift occurred without detailed business requirements, was lacking due diligence, and market testing, despite the scale and complexity of the change.

Project delivery quickly encountered delays, missed milestones, and increasing evidence that the NEC solution could not meet INZ's requirements. More than 170 change requests were raised, highlighting ongoing fit-gap challenges, extensive customisation, and an unstable design and testing foundation. The NEC solution ultimately diverged so far from its original design that it would have required a non-standard long-term support.

The relationship between INZ and NEC was strained throughout, marked by formal breach notices, poor transparency, and persistent disagreements over requirements. High staff turnover across both organisations compounded delivery challenges. Over time, project activities, including requirements definition, development, and testing, were forced to occur in parallel, further degrading quality and governance oversight.

Governance processes were slow to establish and were often bypassed, with critical decisions made without documentation or appropriate scrutiny. Independent assurance repeatedly identified major risks, yet interventions were limited and largely ineffective. Despite escalating issues, the project continued for several years before ultimately being stopped, having delivered no measurable benefits while incurring significant cost overruns.

The governance meeting minutes, particularly those of the Delivery Governance Board (DGB) often lacked clarity, with many of the meetings showing no documented decisions or actions.

Ministerial reporting has been inconsistent, at times overly optimistic, and occasionally misrepresenting the true status of the project. Establishing an accurate view of total project costs has proved difficult. Current estimates indicate costs of approximately \$35 million for BCU and \$8.5 million for IPE, though earlier records suggest BCU alone may have approached \$40 million.

The challenges encountered in delivering BCU are not unique and mirror those seen in other major project failures. However, the persistence in continuing despite multiple red flags and clear opportunities to halt the programme earlier is concerning. While discontinuing the project was ultimately the correct decision, the evidence suggests this could have occurred earlier given the fundamental misalignment between the NEC solution and INZ's business needs.

Key Findings

- The project's original objectives were clear, but the supporting analysis in the business cases was overly optimistic and insufficiently evidenced.
- Covid-19 related decisions were made without the level of due diligence required for an investment of this scale.
- The absence of well-defined business requirements and outcomes critically undermined project success.
- Governance structures were established late, and several early decisions lacked adequate documentation.
- Leadership allowed significant risks to persist without effective mitigation or timely intervention.
- Escalations frequently occurred outside formal governance channels, reducing the effectiveness of oversight.
- Delivery challenges were evident from the outset, leaving the project with limited prospects of success.
- High levels of staff turnover across the project and governance groups compounded delivery and continuity issues.
- Optimism bias was evident at both project management and governance levels.
- The volume of change requests should have signalled substantial underlying issues.
- The NEC solution was not fit for purpose and required extensive customisation.
- Testing never stabilised; fixes frequently introduced new defects.
- The go-live date was repeatedly delayed, leading to significant cost overruns.
- The relationship with NEC was difficult and characterised by ongoing challenges.
- Ministerial reporting was inconsistent and, at times, overly optimistic or misleading.
- The initiative was largely treated as an IT project rather than a business-driven transformation.

Background

The Identity Management (IDme) solution is a core system used by Immigration New Zealand (INZ) as the authoritative source of identity information for all non-New Zealanders. Initiated in 2012 and operational from 2016, the platform was complex, costly, and required several major updates after go-live to resolve stability issues. Despite these interventions, the solution continued to rely on biometric algorithms delivered in 2012, resulting in outdated technology and higher levels of manual processing than originally intended.

In November 2018, INZ launched the Biometric Enhancement workstream as part of its broader ICT Systems Maintenance Programme. This programme aimed to upgrade the IDme biometric algorithm and improve system scalability, while also replacing the unstable In-Person Enrolment (IPE) component. To support streamlined procurement, INZ sought, and received, an exemption in late 2018 allowing continued use of incumbent suppliers, including NEC.

During 2019, INZ developed two single-stage business cases: one for IPE (March 2019) and one for the Biometric Capability Update (BCU) (August 2019). Both cases followed the Treasury Better Business Case framework and recommended NEC-based solutions. However, the level of supporting analysis was limited, with incomplete option assessments and insufficient evidence underpinning the proposed benefits. While the IPE proposal noted architectural alignment and improved reliability, no financial benefits were quantified. The BCU proposal positioned the upgrade as cost-neutral and self-funding, but its projected savings lacked detailed justification.

Overall, while the business cases established clear intentions to modernise biometric capability and improve system performance, the assumptions underpinning these proposals were optimistic and lacked the depth required to support decisions of this scale.

The Business Cases

In 2019 Immigration New Zealand (INZ) developed two single-stage business cases: the In-Person Enrolment (IPE) business case (March 2019) and the Biometric Capability Update (BCU) business case (August 2019). Both followed the Treasury Better Business Case framework and sought to modernise core components of the Identity Management (IDme) system.

IPE Business Case

The IPE business case outlined the need to replace an unstable biometric enrolment solution that had resulted in repeated failures to capture biometric data. The case highlighted risks to border security, inefficiencies, and reliance on outdated technology. Three options were considered, but the analysis lacked depth and did not reference supporting data. Despite this, the recommended option, an NEC-based solution, was approved based on perceived alignment with future architecture.

Costs for IPE were estimated at \$2.26 million in capital expenditure, \$33,180 in operating expenditure, and a whole-of-life cost of \$3.94 million. No financial benefits were quantified; instead, benefits were described qualitatively, including improved reliability and reduced risk of biometric capture failure. However, no evidence was provided to demonstrate the likelihood of achieving these outcomes.

BCU Business Case

The BCU business case proposed a significant maintenance upgrade to the IDme system, which remained reliant on 2012 biometric algorithms. The case positioned the upgrade as cost-neutral and self-funding over the asset's life, though the projected savings of \$18.79 million over five years were not supported by detailed analysis. The recommended approach relied on continued use of NEC, enabled through a procurement exemption granted in late 2018.

Estimated BCU costs included \$10.46 million in capital expenditure, \$46,272 in operating expenditure, and a whole-of-life cost of \$19.49 million. The business case did not provide evidence to substantiate key assumptions underpinning proposed benefits or solution viability.

Assessment

Overall, while the business cases clearly articulated the need to modernise biometric capability, both were overly optimistic and lacked the analytical rigour necessary for an investment of this scale. Assumptions were insufficiently tested, options analysis was limited, and supporting documentation, particularly for requirements provided to vendors, was either incomplete or not retained. These gaps reduced the strength of the investment rationale and contributed to downstream delivery challenges.

Project Delivery

Summary

Project delivery challenges emerged early and persisted throughout the programme's lifecycle. Although the original business cases provided a broad delivery pathway, this foundation quickly weakened as the project progressed. The onset of Covid-19 intensified existing pressures, driving rapid cost-cutting decisions and accelerating a shift toward replacing legacy systems that were viewed as costly, unstable, and overly reliant on manual intervention.

Several critical decisions were made at pace during this period without the level of analysis or due diligence expected for an investment of this scale. Documentation from this time confirms that key choices were fast-tracked and often lacked sufficient supporting detail. One significant decision was for INZ to assume the role of Systems Integrator, based on an expectation that the project would consolidate INZ's broader technical environment. This exposed the programme to the complexity of the IDme ecosystem and placed INZ in a direct commercial relationship with NEC.

Early indicators of misalignment were evident through delays, unclear requirements, and persistent disagreements between INZ and NEC. Foundational project artefacts such as business requirements and functional specifications were developed years after work began and remained in flux, undermining scope clarity and stability. The shift to an "out-of-the-box" NEC solution occurred without an appropriate level of fit-gap analysis, despite the substantial functional differences that became evident between INZ's operational needs and the vendor's offering.

These weak foundations led to ongoing delivery issues, extensive customisation, and a near-constant stream of change requests. In total, more than 170 operational changes were raised, signalling deeper structural issues in both solution design and partnership management. Major change requests that proceeded significantly altered scope, budget, and timelines, yet lacked the depth of analysis required to support these decisions.

Overall, the project never achieved the stable baseline necessary for effective design, build, or testing phases. The absence of clear requirements, delays in establishing robust governance, escalating vendor tensions, and fragmented decision-making combined to inhibit quality, introduce significant risk, and reduce the project's likelihood of success. Ultimately, these cumulative factors contributed to repeated schedule slippage, cost escalation, and the eventual discontinuation of the programme.

Key Findings in the Delivery Journey

- A Master Services Agreement with NEC was executed in June 2019, followed by Statements of Work for BCU in August 2020 and IPE in December 2020 significantly later than the original business case approvals.
- At project initiation, detailed business requirements and defined outcomes were not in place, despite their importance for establishing clear scope, timelines, and budget confidence.
- Core requirement documents for IPE and BCU were developed years into the project and underwent continuous revision, signalling early instability in scope and alignment.

- In August 2020, the project shifted from a system upgrade to a full replacement of the IDme platform using NEC's out-of-the-box solutions, without adequate fit-gap analysis.
- Internal business requirements were deprioritised after adopting an out-of-the-box solution, limiting the project's ability to assess suitability and establish a robust design baseline.
- Early disagreements between INZ and NEC regarding required functionality highlighted misalignment and should have been treated as warning signs necessitating stronger intervention.
- The project was never built on a stable foundation, increasing delivery risks and undermining subsequent design, build, and testing phases.

Clear and agreed business requirements are essential to establishing a project's scope, timeline, and budget. They provide the foundation for due diligence and for assessing the suitability of proposed solutions. In this case, no fit-gap analysis was found, and feedback indicates that INZ understated its requirements Commercial Information, Negotiations

Requirements documentation emerged only after early and ongoing disagreements about the level of functionality and automation needed, highlighting foundational misalignment between the parties. These early issues, combined with delays in completing the initial statements of work, were strong indicators that the project and vendor relationship were deteriorating and required earlier intervention.

Projects without well-defined foundations face significantly higher risks of failure; this project lacked the stable base necessary to support effective design, delivery, and testing.

Change Requests

Over the course of the project, six major Change Requests (CRs) were submitted for governance approval. While this number appears modest, it does not reflect the more than 170 operational-level change requests that were raised throughout delivery, a clear indicator of deeper structural and solution-fit issues within the programme.

The summary below focuses on the six governance-level Change Requests, which represented significant shifts in scope, cost, and timelines.

CR1 – May 2020

CR1 increased both scope and budget by consolidating activities from other INZ maintenance projects into the BCU project to reduce duplication. This lifted the project's Whole-of-Life Cost (WOLC) to \$21.4 million.

CR2 – August 2020

CR2 represented the most consequential pivot in the project. It transformed BCU from a maintenance upgrade into a full replacement of the IDme system, adding a workflow engine and merging the IPE project into BCU.

Despite the scale of this change, no supporting analysis or documentation was found. The go-live date shifted from July 2020 to February 2021, and WOLC increased to \$24.4 million. Based on the information provided, the lack of detailed due diligence and apparent challenge to this decision, particularly given the procurement exemption in place and the known complexity of IDme was I believe a significant governance failure.

CR3 – November 2021

CR3 requested additional time and funding after CR2 underestimated the complexity of replacing IDme. The go-live date moved to July 2023, and WOLC increased to \$30.4 million, with ministerial approval.

CR4 – September 2022

CR4 sought further increases to budget and timelines due to slow progress by the primary vendor (NEC). Go-live was moved to August 2023, and WOLC increased to \$31.9 million.

CR5 – June 2023

CR5 again increased budget and the schedule, citing NEC delays in addressing security vulnerabilities, data migration, and technical documentation. Go-live was moved to November 2023, and WOLC increased slightly to \$31.95 million.

CR6 – April and December 2024

Two versions of CR6 were produced.

April 2024 version:

Proposed returning BCU to its original scope and separating IPE into an independent project. It also requested additional funding, bringing BCU's WOLC to \$39.98 million. This version required Cabinet approval due to exceeding the \$35 million threshold and was endorsed in principle.

December 2024 version:

Revised costings (BCU WOLC \$34.4 million; IPE \$8.53 million), maintained the separation of BCU and IPE, and proposed deferring go-live to April 2025 with project closure in June 2025. This version removed some defects for later resolution in BAU. All recommendations were approved.

Observations

The Change Requests collectively show repeated increases to cost, scope, and time, alongside persistent delivery challenges. They highlight multiple missed opportunities for earlier governance intervention and underscore the extent to which the project lacked stable foundations, effective oversight, and clear requirements.

Project intervention

The project underwent two formal pauses: the first in November 2023 and the second in November 2025.

The initial pause was triggered by persistent delivery failures, ongoing quality issues, and escalating costs. On 6 November 2023, three MBIE Deputy Secretaries met urgently to review the project's financial position and consider options for remediation. Four options were presented:

- Option A: Stop the project
- Option B: Pause and reassess
- Option C: Slow delivery
- Option D: Continue as planned

Options C and D were dismissed because they would result in continued cost escalation, and Option A was set aside to ensure alternative pathways could still be evaluated. Option B was endorsed, resulting in an immediate pause of all project activity.

While pausing the project was appropriate, the process bypassed established governance procedures. An out-of-cycle governance meeting should have been convened, ensuring all members were informed, minutes were recorded, and decisions formally documented. At this stage, the available evidence was sufficient to justify a full project shutdown, yet this option was not explored in depth. Commercial Information, Negotiations

The second pause in November 2025 ultimately led to the project's discontinuation.

Governance & Leadership

No formal governance existed for this project until June 2019.

INZ initially established a "Reference Group" to oversee the project. It is assumed that prior to this group being formed the INZ leadership team meetings would have been the governing body.

No terms of reference were found for this group, and the first minutes were dated May 2020.

The early critical decisions that gave rise to the approval of CR2 were made by this Reference Group. A BCU funding memo for CR 2 was approved in August 2020 by the then Deputy Chief Executive of Immigration NZ and counter signed by the MBIE CFO.

In October 2020 the Reference group was disbanded and a BCU Steering Committee was formally established.

The Terms of Reference (ToR) for the steering committee were finalised and distributed in October 2020. The ToR was well constructed and clear. The ToR also covered the steering committee delegations across the dimensions of both time and cost which is considered to be good practice.

At the time the steering committee reported to a Business Change Board within INZ and this in turn reported to the INZ Leadership Team.

The minutes of the first Steering Committee meeting noted that: -

"As previously advised NEC have missed critical milestones. NEC did not meet their first deliverable to provide a NEC Schedule by 15 September and have now not met the deliverable for the NEC Detailed Design, Data Migration Model and NEC Test plan by 30 September."

As early as June 21 this project was being flagged as red in steering committee reports and this pattern continued on a regular basis through to Late 2025 when the project was discontinued.

The Delivery Governance Board (DGB) was established in August 2022. The ToR for the DGB was well constructed and provided clear delegations between itself and the project steering committee. Project reports were submitted to each meeting and minutes of the meetings were documented.

The minutes of DGB have been summarised to such a high level that it is impossible to tell what actually transpired during these meetings. There are many instances of DGB minutes noting that no actions or decisions were recorded.

Given the number of issues and challenges being managed by this project I would have expected considerably more action and intervention from the DGB.

Interviews with governance participants indicated that many discussions at the DGB were not documented due to commercial or business sensitivities. Several key decisions were made by executives outside both the DGB and the steering committee, and escalations often bypassed formal governance processes, with limited reflection in meeting records.

Governance should operate as a mechanism for timely intervention, not merely as a procedural formality. Based on the documentation reviewed and the interviews conducted, there were clear shortcomings in governance transparency and accountability. Earlier and more decisive intervention would likely have prevented the project from continuing in an unsustainable state.

Ministerial Apology and relevant Aide Memoire's

Preceding the April 2024 change request a report had been sent to the Minister in March 2024 that was then challenged by the Minister.

The report that went to the Minister sought agreement to increase the whole of life costs for the project to \$39.9 million by either:

- Seeking agreement through the Immigration Fee and Levy Review Cabinet Paper or
- Seeking agreement via a separate Cabinet process

The paper also incorrectly stated that the BCU project is well progressed in its final year, however, project costs have increased due to:

- The COVID-19 pandemic delaying the project significantly, as MBIE had to reprioritise resources to support the Government's response
- Unforeseen complexity in the initial scoping and technical challenges which led to significant changes from the original specifications to ensure that the update can work within the wider immigration ICT platform, and
- All-of-government cyber security guidelines have evolved over the term of the project and MBIE has had to adapt the solution to meet these new standards, requiring additional time and funding.

As estimated costs were now expected to exceed \$35 million, Cabinet approval was required.

The addendum to this report also stated in the project assurance section that:

"The project has undertaken three Independent Quality Assurance (IQA) reviews, the last one being in September 2023. The latest IQA confirmed the project approach was sound and robust, the build is achievable, and the risk management practice is effective. The project has implemented the IQA recommendations and continually looks for opportunities to improve."

On the 30 April 2024 the MBIE CEO responded and issued an apology for the advice provided. The letter went on to say that there were two key issues:

"The first was the need to be fully open and transparent with the Minister about the 'troubled' nature of this project, and to do so early. As a project that has had a series of increases to costs, scope and timelines, it was important to lay out as fully and transparently as possible to a new

Minister the history of the project, including the issues faced, the risks of any further issues that may still arise, and the steps that were being taken to provide the Minister with confidence that the project was 'back on track'. This is particularly the case given the relatively bespoke nature of this project and the specific challenges involved with the provider."

"There was a clear mismatch between what MBIE officials (who have been deeply involved in this project, including the series of actions taken since the commissioning of the October 2023 IQA to 'grip up' the project) understood and what was explained to the Minister."

"The second issue was the quality of the advice that was provided to the Minister in the 19 March briefing, particularly the inclusion of the phrase that the IQAs had "confirmed" that the project approach was sound. This advice was incorrect and misleading. I have not found any evidence of a deliberate intention to mislead. On the contrary, the statement that the IQAs had "confirmed" the project approach was sound comes from a relatively junior staff member and this was not picked up in subsequent reviews. The back-and-forth nature of the email exchanges also shows that there was a not a settled view on the content of the addendum with different opinions on how much detail to include in the addendum versus a separate briefing to the Minister."

"The issues relating to the quality of advice were compounded by the (self-generated) pressure to provide the advice to the Minister before the Fees and Levy paper was lodged for Cabinet. If the Minister was going to agree to the increase, then there would be less than two days between her receiving the policy briefing and the Fees and Levy Cabinet paper needing to be lodged. As is often the case, when there are time pressures the likelihood of making process or judgement mistakes increases."

The September 2023 IQA referred to above in fact highlighted that: -

*"Despite previous agreement of a refreshed delivery plan, and a firm governance commitment to achieving the delivery timeframes, the project will not achieve the current Go Live date of 17 November 2023. Given the project's poor delivery history, and its inability to meet agreed milestones, **we have doubts as to whether the project will in fact deliver at all**, and we question its continuation."*

Whilst the letter of apology stated that there had been no evidence of a deliberate intention to mislead, I find that the information that was provided to the Minister, was not supported by any of the artifacts in place either before or after this memo had been sent. The reasons provided in the memo for both the delay and increased costs did not appear in any project or governance reporting at the time.

Following the above exchange further advice to the Minister that year reflected a completely different picture to that contained in the March Ministerial update.

August 2024 an Aide Memoire to Minister Stanford stated that as of 30 August 2024, the forecasted Whole of Life Cost (WOLC) remains under the approved \$35m. It further stated that if the project go live is deferred to next year, completion of the project within the approved WOLC is possible, however, all costs will need to be managed very tightly, and no unexpected significant costs can arise. Remaining contingences would be used within the \$35m threshold.

No project documentation and governance documentation after March 2024 provides any rationale for what changes were then made to enable the project to stay within the original WOLC

envelope. This was even more surprising given that the project was again significantly further delayed to mid-2025.

Scope Management

Clear and agreed scope definition is essential to establishing a project's direction, timelines, and budget. In this project, scope management was weak from the outset.

The early assumption that NEC's solution could meet INZ's business requirements proved incorrect and led to extensive customisation that ultimately rendered the solution unsuitable for standard support and maintenance.

Detailed business requirements were developed late and underwent frequent revision, preventing the establishment of a stable design baseline. Without this baseline, the project was unable to set reliable milestones, manage change effectively, or progress through design, build, and testing with confidence.

Overall, the lack of rigorous scope definition and control contributed significantly to delivery instability, misunderstood expectations, and persistent misalignment between INZ and NEC. Strengthening scope governance earlier would have reduced risk and improved the project's ability to deliver a viable solution.

Testing

System Integration Testing (SIT) commenced in October 2023 and continued through 2025. The extended duration was a direct consequence of unclear requirements, ongoing scope changes, and the volume of solution modifications undertaken throughout the project.

A mid-2025 test team report indicated that a significant backlog of defects remained, most of which required remediation by NEC. While the project maintained comprehensive testing records and provided clear summaries to both the Steering Committee and the DGB, the data showed a recurring pattern: incremental improvements were regularly followed by sharp declines in test stability.

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Effective testing depends on stable, design and build baselines. At no point did the project achieve this stability.

Design, configuration, and customisation activities continued well into the testing phases, and parallel workstreams meant new gaps and inconsistencies were frequently uncovered. As a result, testing could not progress in a structured manner, and quality assurance processes were repeatedly undermined.

Overall, the project's testing challenges were symptomatic of deeper delivery issues, late and evolving requirements, extensive customisation of the NEC solution, and a lack of foundation for progressing through structured test phases with confidence.

Benefits Management

The original BCU business case projected operational savings of \$18.79 million over five years; however, these estimates were not supported by detailed analysis and were optimistic relative to the project's maturity and available evidence.

The IPE business case did not quantify financial benefits but outlined qualitative improvements, including better architectural alignment and enhanced reliability of biometric capture to support border and risk-management activities.

No benefit realisation plan was identified during this review, and references to benefit tracking in project documentation were limited.

Change requests acknowledged benefit impacts but did not reassess or update benefit assumptions despite significant shifts in scope and cost.

Overall, benefits management did not appear to have been a sustained focus for the project or its governance groups. Assumptions underpinning proposed benefits were not revisited as risks escalated or delivery challenges emerged, which were clearly identifying reducing confidence that the original value proposition could be achieved.

People

The project experienced sustained and significant personnel turnover, which materially affected delivery effectiveness and organisational continuity.

Over its duration, the project cycled through at least 12 project managers, three programme or project directors, and six project sponsors, with widespread turnover across most professional disciplines. Turnover at the governance layer was also high.

This instability impeded the formation of a cohesive delivery environment and contributed to recurring challenges in co-ordination and knowledge retention.

Feedback indicated that some staff were replaced due to skill gaps or because they raised concerns about the project's viability. NEC also faced substantial staff turnover, most notably the departure of its North American requirements team. Their exit disrupted continuity and reportedly increased translation challenges between business requirements and NEC's development teams.

Overall, the high rate of personnel change, across both the project and governance groups, was a consistent indicator of a troubled programme and limited the project's ability to stabilise delivery or maintain collective accountability.

Multiyear projects require a stable workforce, and while some attrition is inevitable, effective succession and continuity planning are essential. Based on the information available, it appears that neither was sufficiently in place. The sustained level of staff turnover was a clear indicator of deeper issues and contributed to the project's ongoing instability.

Change Management

Change management activity featured only minimally at the governance level, which is understandable given that most end-user change activity typically occurs later in a project's lifecycle.

This review has therefore focused on the early-stage issues that contributed to the project's discontinuation rather than on the change management workstream itself.

However, I note that a change management update rated the stream as "green" and partially ready for a November 2025 go-live. It is unclear how this assessment was reached given the wider project's condition, though this review has not examined the matter in detail.

Quality Assurance

Quality assurance activities included nine external reviews and one internal health check conducted over the life of the project.

The first external review was completed in June 2021, with at least one review undertaken each subsequent year. One review focused specifically on cyber security and is discussed in the relevant section of this report.

Most external reviews concluded that while delivery remained feasible, significant risks required active management. Several reports emphasised that strong governance, characterised by clear accountability, transparency, and adherence to agreed milestones, was essential for successful delivery.

A notable exception was the October 2023 review, which rated the project as unlikely to succeed and warned that the Go Live date of November 2023 would not be met due to persistent delivery failures. This review appears to have contributed to the decision to pause the project in November 2023 and undertake a replan.

The reviews focused primarily on delivery risks and did not examine early-stage decisions, particularly those linked to the major change in scope introduced through Change Request 2. This gap represented a missed opportunity to independently assess the impact of those decisions and better understand their long-term consequences.

In hindsight, earlier scrutiny by the reviewers, of the extensive customisation of the NEC solution [redacted] Commercial Information, Negotiations [redacted] may have highlighted [redacted] Commercial Information, Negotiations [redacted] problems sooner.

These concerns were however known to both the project team and governance groups and were consistently raised during interviews.

Cyber Security

Cyber security remained a persistent and material issue throughout the project. Multiple attempts were made to reach agreement with NEC on resolving identified vulnerabilities;

however, progress was limited, and NEC was often slow or unwilling to address concerns raised by MBIE.

The project underwent several security assessments, the most recent in October 2024, which identified numerous technical vulnerabilities, including seven rated as High risk. Remediating these issues directly within the NEC solution was deemed impractical in the short term due to limited vendor responsiveness, the potential scale of required code changes, and uncertainty about the resulting impacts on stability and functionality.

As an interim mitigation, the project adopted a “walled garden” approach, isolating and protecting the BCU-related systems by tightly controlling access and reducing exposure. While pragmatic in the circumstances, this additional layer of security should not have been required had the underlying solution met expected security standards.

External reviewers also noted that such an approach is unusual for an out-of-the-box product.

Overall, cyber security risks were significant, persistent, and required workarounds rather than direct remediation of core vulnerabilities. These issues contributed to delivery delays, additional cost, and reduced confidence in the long-term viability of the solution.

Risk Management

Risk management throughout the project was insufficient and lacked the structure expected for an initiative of this scale. A formal risk management plan was not included among the project’s core control documents, and governance records show limited evidence of systematic oversight. Although the project faced numerous significant issues, risks did not appear to be consistently escalated, reviewed, or mitigated through formal governance channels.

The available risk and issues register does not reflect the complexity or volume of challenges encountered. Interview feedback indicates that risk management was largely reactive, with project teams focused on resolving immediate problems rather than proactively identifying and mitigating emerging risks. As a result, risks accumulated and often materialised before meaningful action was taken.

Effective governance requires risk management to be a standing agenda item, supported by clear ownership, active monitoring, and timely intervention. These disciplines were not consistently applied, contributing to ongoing delivery instability and limiting the programme’s ability to anticipate and address systemic issues.

Vendor Management

The project engaged multiple vendors, with NEC serving as the primary supplier of the biometric algorithms underpinning the IDme solution. Prior to the BCU project, INZ had no direct commercial relationship with NEC, as NEC’s software was managed through Daon. Datacom continued in its established role as the technology support partner, consistent with its involvement in the original IDme delivery.

Interviewees also acknowledged that INZ contributed to relationship difficulties through unclear requirements and suboptimal internal decision-making. Although attempts were made to reset the relationship, improvements were short-lived, and the partnership remained strained throughout the project.

Project Costs

Tracking total project expenditure has been challenging due to multiple scope changes, repeated budget adjustments, and the merging and later separation of the BCU and IPE workstreams.

While each major change request increased the project's Whole-of-Life Cost (WOLC), the underlying rationale for several cost shifts, particularly those in 2024 that triggered Ministerial concern, remains unclear.

A total of \$4.44 million was transferred out of the project between 2022 and 2025, further complicating cost transparency.

Interviews indicated widespread uncertainty about the true cost of delivery, with some staff characterising financial management practices as "creative accounting," largely driven by efforts to avoid exceeding the Cabinet-level funding threshold.

The repeated merging and unmerging of BCU and IPE budgets contributed to inconsistent financial reporting, making it difficult to obtain a definitive view of actual expenditure over the six-year duration of the programme.

Consistency of feedback from interviewees

As I have commented on throughout this report there has been a very high level of consistency in the feedback provided during the interview.

The consistent themes are summarised as follows: -

- Early decisions lacked detailed due diligence
- Business requirements or the lack of these were a problem right from the start
- The project and governance impacted by high levels of people change
- Testing fixes more often than not created more problems
- Commercial Information, Negotiations
- Lack of clarity and transparency around why big decisions were made
- Decisions were regularly being made outside of governance
- Why was it not stopped earlier
- The project delivery model was not business lead

All interviews were constructive and the feedback spanned all aspects of the project. Whilst the interviews were non attributable a number of those interviewed mentioned that they had no problem with being quoted in the final report. There was a strong desire from those interviewed to ensure that the lessons learned from this project were shared to make sure that this type of project outcome is avoided in the future

MBIE Project Delivery model

The project's delivery model shifted from being led within INZ to being managed centrally through DD&I. This centralised, technology-focused model often lacked alignment with business outcomes. Although business resources participated, the BCU programme continued to be viewed primarily as a technology initiative rather than a business-driven change.

Centralised ownership of both project resources and budget blurred accountability and reduced the business's sense of ownership.

While this model can be effective for technology-only initiatives, successful business change requires clear business accountability, with the technology function providing strong but secondary support.

The Role of the Centre

Because the project initially began as an upgrade within INZ's delegated authority, the Central Agency's high-risk project role was not engaged.

The Treasury Gateway process provides structured assurance for complex initiatives, and while mandatory for high-risk projects, it is also commonly applied voluntarily across agencies and SOEs.

More frequent use of Gateway would strengthen assurance and give the executive greater visibility of delivery performance.

Ministerial Reporting

I have touched previously on aspects of ministerial reporting in this report.

The frequency of reporting to the Minister was consistent with updates on the project being reported as part of the wider Ministerial weekly report. Project dashboards were also shared with the Minister from mid-2025.

Given the number of challenges and issues experienced over the course of the project I have found that the messaging to the Minister has largely been generic and has not reflected the reality of what was happening with the project.

As previously mentioned, the memo in March 2024 that gave rise to the apology to the Minister did not appear to be supported by the internal reporting at the time. In fact, the first version of CR6 which was drafted in March 2024 and submitted to governance in April 2024 detailed vastly different reasons for the increase in project time and cost.

It is difficult to understand how this memo was so materially wrong and even harder to understand what actually transpired during the remainder of the year that allowed the project to stay within the budget of \$35m even after the go live was moved into 2025.

I have not detected any deliberate attempt to mislead but as noted earlier it has been difficult to follow the budget change and the project reporting to the Minister has not been consistent in portraying the real state of the project.

Lessons learned

Overall, the BCU project was undermined by unclear requirements, inadequate due diligence, ineffective governance, strained vendor relationships, and persistent delivery failures. These factors collectively prevented the project from achieving its intended outcomes and resulted in substantial financial and operational impacts.

Project leadership and governance should apply the following principles to all initiatives:


- Clearly define the problem and evaluate all viable options.
- Establish unambiguous business outcomes and requirements.
- Reduce unnecessary complexity and remain open to transforming business processes.
- Identify the critical competencies needed for delivery and ensure resources with proven capability are in place.
- Undertake thorough due diligence to confirm vendor capability and track record.
- Ensure contracts are balanced and include clear stage gates and off-ramps for underperformance.
- Finalise and agree requirements and expected outcomes before contracting.
- Confirm that the SRO and Sponsors have the appropriate experience, with clear roles, responsibilities, and governance structures.
- Maintain a clear delegation framework when multiple governance bodies are involved.
- Ensure governance is transparent and that minutes accurately record discussions and decisions.
- Manage escalations and mitigations through established governance channels.
- Include independent expertise on governance boards.
- Involve business users and subject matter experts in requirements, testing, and implementation.

- Manage key vendors at both strategic and operational levels, enforcing contract terms when required.
- Maintain independent, comprehensive quality assurance with direct reporting to the Executive Governance.
- Apply strong change control, noting that long-duration projects rarely unfold exactly as planned.
- Be prepared to challenge or stop projects when viability is compromised.
- Prioritise clear definition and control of scope to prevent recurrence of these types of issues.

Appendix 1 Document and Interview List

Interviewees

Privacy of natural persons



Documents Provided:

Architectural Documentation
IPE Solution Design Part B
BCU Application Solution Design Part B
BCU Architectural Solution Design Part A
BCU Infrastructure Solution Design Part B
BCU PA-OIA Report Solution Design Part A-B
BCU Security Remediation Part A-B
IPE Part A (FINAL)
BCU Reference Group Minutes & Reports
200519 BCU and IPE Project Reference Group Minutes
200603 BCU and IPE Project Reference Group Minutes
200616 BCU and IPE Project Reference Group Minutes
200630 BCU and IPE Project Reference Group Minutes
200714 BCU and IPE Project Reference Group Minutes
200731 BCU and IPE Project Reference Group Minutes
200812 BCU and IPE Project Reference Group Minutes
200825 BCU and IPE Project Reference Group Minutes
200910 BCU and IPE Project Reference Group Minutes
200923 BCU and IPE Project Reference Group Minutes
200519 HL Schedule
200601V2 - 3644 - BCU Status Report
200615 - 3644 - BCU Status Report
200629 - 3644 - BCU Status Report
IPE Status Report WE 29th May
IPE Status Report WE 26th June
BCU Project Summary 31 July 2020
BCU Project Summary 12 August 2020
BCU Requirements
NEC BCU Business Requirements V1.6 Approved
NEC BCU NFR Support Data v1.0 Approved
NEC BCU Non-functional requirements v1.0 approved
NEC IPE Functional Specification v2.5 APPROVED
NEC IPE Hardware Requirements v2.2 Approved
NEC IDme Functional and Non-Functional Requirements v1.0 incl feedback July 2020
BCU Project Requirements Reconciliation
Email trails from MBBIE to NEC providing MBIE approved requirements and designs
NEC IBW Core_Configuration_Details_Integra-ID_v1.4 2022-04-07 APPROVED
NEC MBIE_IBW Core_Configuration_Requirements_Document_(CCRD)_Integra-ID_v2.0 APPROVED
NEC MBIE_REVEAL_UI_Specific_Configuration_Details_v1_24 APPROVED
NEC MBIE_Specific_Configuration_Requirements_Document_(CSCRD)_05_12_2022_V3_2 APPROVED
Reveal Wireframes Ad Hoc Search Wire Frame-updated-05-12-2022 APPROVED
Reveal Wireframes Dashboard - Analysis - Verify - Results-updated-04-07-20221 APPROVED
Reveal Wireframes Gallery Search & QC Edit Wire Frame-updated-04-07-202211 APPROVED
Reveal Wireframes Global Search Wireframe_2_24_2022 APPROVED
Reveal Wireframes Unknown Face Enrollment Wire Frame_2_22-2022 APPROVED
CE Review March/April 2024
Review of BCU Information provided to MOI - emails
Correspondence Out - Hon Erica Stanford, Minister of Immigration - letter of apology re biometric capability update project
Final memo to CE on Biometric Capability Update
Annex 2 Document 13_Updated 30Apr24
Table of contents_Annex 2_Updated 30Apr24
Annex 1_Documents_Updated 30Apr24
Table of contents_Updated 30Apr24
CE/DCE/DGB Memos
Memo- BCU Capitalising
Memo - BCU, IPE and Value Stream Financial Status Outline (Draft)
Memo - CE Status and Options Recommendation - 9 Dec 2025
DGB Memo - 11 April 2023

DGB Memo - IQA Memo 12 June 2023
DGB Memo 14 August 2023
DGB Memo 11 September 2023
DGB Memo 19 February 2024
DGB Memo 18 March 2024
DGB Memo 20 May 2024
May 2024 - Item 03.2 3644 BCU Memo to DGB Appendix C
DGB Memo 15 July 2024
DGB Update 15 August 2024
DGB Update 16 September 2024
DGB Update 21 October 2024
DGB Update 18 November 2024
DGB Update 16 December 2024
DGB Update 17 February 2025
DGB Update 17 April 2025
DGB Update 19 May 2025
DGB Options Paper
DGB Paper BCU (dated 13 November 2023)
Appendix One - Summary Options for BCU
BCU Options - Privacy of natural persons email trail NOV 23
BCU Options Paper – draft
Legal Correspondence 2022
Email from Privacy of natural persons (MBIE Project Sponsor) to Privacy of natural persons (Director, NEC NZ) re Notice letter - 29 March 2022
NEC BCU Milestone Notice Letter - 29 March 2025 (MBIE to NEC)
NEC Letter in Response (MBIE to NEC) - 27 May 2022
Email from Privacy of natural persons to Privacy of natural persons re MBIE response to NEC - 30 May 2022
NEC Response Letter to MBIE - BCU Project - April 2022
Legal Correspondence 2023
Letter to NEC from MBIE regarding the BCU and IPE Projects (24 November 2023)
NEC letter to MBIE re BCU and IPE Projects (dated 13 November 2023)
Letter from NEC to MBIE 4.12.23
Letter to NEC from MBIE regarding the BCU and IPE Projects 24.11.2003 (002) (sent 06 December 23)
Legal Correspondence 2025
Response to MBIE from NEC re termination (dated 19 January 2026)
Correspondence Out - Privacy of natural persons, NEC Australia NZ (dated 10 November 2025)
Correspondence Out - Privacy of natural persons, NEC Australia NZ (dated 16 December 2025)
MBIE Response to NEC re payment claim under IPE SoW (dated 22 January 2026)
Letter to Privacy of natural persons NEC Australia NZ - Open Letter (dated 24 October 2025)
Letter to Privacy of natural persons NEC Australia NZ - without prejudice (dated 24 October 2025)
MBIE Internal notes in response to NEC's 04 November letter
NEC Response to MBIE (dated 04 November 2025)
NEC NZ response to CE MBIE 5.2.26
Ministerial Briefings, Updates and Aide Memoires
Briefing – seeking joint minister’s authorisation for internal funding/increase WOLC to \$30.42m
Aide Memoire - seeking joint minister’s authorisation for internal funding
Briefing re Increase of WOLC to \$35m
Briefing re Draft Cabinet Paper – Increase in whole of life costs for Immigration Biometrics Upgrade (not submitted)
Briefing re Proposed approach to increasing WOLC (above \$35m)
Aide Memoire re Further information on the BCU Project and proposed increase to WOLC
Aide Memoire – summary of latest IQA report
Aide Memoire – further detail on IQA reports from EY and Privacy of natural persons
Aide Memoire – Project Update
Aide Memoire – project update noting postponement of go-live date to April 2025
Aide Memoire – Project Update
Aide Memoire – Project Update
Aide Memoire - Project Update
Aide Memoire - Project Update
Aide Memoire - Project Timeline and Minister Briefings
Note to MEG re BCU Project 17NOV25
Briefing to MOI and MEG re BCU Status and Recommendations (9 DEC 25)

2223-0648 Weekly Report to the Minister of Immigration and Associate Minister
2223-1582 Weekly Report to the Minister of Immigration and Associate Minister
2223-1955 Weekly Report to the Minister of Immigration and Associate Minister
2223-2401 Weekly Report to the Minister of Immigration and Associate Minister of Immigration
2223-2405 Weekly Report to the Minister of Immigration and Associate Minister of Immigration
2324-0009 - Weekly Report to the Minister of Immigration and Associate Minister of Immigration - 9 August 2023
2324-0015 -Weekly Report to the Minister of Immigration and Associate Minister of Immigration - 20 September 2023
2324-0026 Weekly Report to the Minister and Associate Ministers of Immigration - 21 February 2024
2324-1101 Immigration system operating environment – Ministerial Briefing
2324-2486 Weekly Report to the Minister and Associate Ministers of Immigration
2324-2487 Weekly Report to the Minister and Associate Ministers of Immigration
2324-2488 Weekly Report to the Minister and Associate Ministers of Immigration
2324-2489 Weekly Report to the Minister and Associate Ministers of Immigration
2324-2490 Weekly Report to the Minister and Associate Ministers of Immigration
2324-2491 Weekly Report to the Minister and Associate Ministers of Immigration
2324-2492 Weekly Report to the Minister and Associate Ministers of Immigration
2324-2493 Weekly Report to the Minister and Associate Ministers of Immigration - 29 May
2324-2494 Weekly Report to the Minister and Associate Ministers of Immigration - 5 June
2324-2495 Weekly Report to the Minister and Associate Ministers of Immigration - 12 June
2324-2496 Weekly Report to the Minister and Associate Ministers of Immigration - 19 June
2324-2497 Weekly Report to the Minister and Associate Ministers of Immigration - 26 June
2425-0061 Weekly Report to the Minister and Associate Ministers of Immigration - 10 July
2425-0062 Weekly Report to the Minister and Associate Ministers of Immigration - 17 July
2425-0063 Weekly Report to the Minister and Associate Ministers of Immigration - 24 July
2425-0064 Weekly Report to the Minister and Associate Ministers of Immigration - 31 July
2425-0066 Weekly Report to the Minister and Associate Ministers of Immigration - 14 August
2425-0067 Weekly Report to the Minister and Associate Ministers of Immigration - 21 August
2425-0068 Weekly Report to the Minister and Associate Ministers of Immigration - 28 August
2425-0070 Weekly Report to the Minister and Associate Ministers of Immigration - 11 September
2425-0071 Weekly Report to the Minister and Associate Ministers of Immigration - 18 September
2425-0072 Weekly Report to the Minister and Associate Ministers of Immigration - 25 September v2
2425-0073 Weekly Report to the Minister and Associate Ministers of Immigration - 2 October
2425-0074 Weekly Report to the Minister and Associate Ministers of Immigration - 9 October
2425-0075 Weekly Report to the Minister and Associate Ministers of Immigration - 16 October
2425-0076 Weekly Report to the Minister and Associate Ministers of Immigration - 23 October
2425-0077 Weekly Report to the Minister and Associate Ministers of Immigration - 31 October
2425-0078 Weekly Report to the Minister and Associate Ministers of Immigration - 6 November
2425-0079 Weekly Report to the Minister and Associate Ministers of Immigration - 13 November - updated
2425-0080 Weekly Report to the Minister and Associate Ministers of Immigration - 20 November
2425-0081 Weekly Report to the Minister and Associate Ministers of Immigration - 27 November
2425-0082 Weekly Report to the Minister and Associate Ministers of Immigration - 4 December
2425-0083 Weekly Report to the Minister and Associate Ministers of Immigration - 11 December
2425-0084 Weekly Report to the Minister and Associate Ministers of Immigration - 22 January 2025
2425-0085 Weekly Report to the Minister and Associate Ministers of Immigration - 29 January 2025
2425-0086 Weekly Report to the Minister and Associate Ministers of Immigration - 5 February 2025
2425-0087 Weekly Report to the Minister and Associate Ministers of Immigration - 12 February 2025
2425-0088 Weekly Report to the Minister and Associate Ministers of Immigration - 19 February 2025
2425-0089 Weekly Report to the Minister and Associate Ministers of Immigration - 26 February 2025
2425-0090 Weekly Report to the Minister and Associate Ministers of Immigration - 5 March 2025
2425-0091 Weekly Report to the Minister and Associate Ministers of Immigration - 12 March 2025
2425-0092 Weekly Report to the Minister and Associate Ministers of Immigration - 19 March 2025
2425-0093 Weekly Report to the Minister and Associate Ministers of Immigration - 26 March 2025
2425-0094 Weekly Report to the Minister and Associate Ministers of Immigration - 2 April 2025
2425-0095 Weekly Report to the Minister and Associate Ministers of Immigration - 9 April 2025
2425-0096 Weekly Report to the Minister and Associate Ministers of Immigration - 16 April 2025
2425-0097 Weekly Report to the Minister and Associate Ministers of Immigration - 23 April 2025
2425-0098 Weekly Report to the Minister and Associate Ministers of Immigration - 30 April 2025
2425-0099 Weekly Report to the Minister and Associate Ministers of Immigration - 7 May 2025
2425-0100 Weekly Report to the Minister and Associate Ministers of Immigration - 14 May 2025

2425-0101 Weekly Report to the Minister and Associate Ministers of Immigration - 21 May 2025
2425-0102 Weekly Report to the Minister and Associate Ministers of Immigration - 28 May 2025
BCU – Minister’s Dashboard 16 May 2025 – Final
BCU – Minister’s Dashboard 21 May 2025
BCU – Minister’s Dashboard 29 May 2025
BCU – Minister’s Dashboard 6 June 2025
BCU – Minister’s Dashboard 13 June 2025
BCU – Minister’s Dashboard 17 June 2025
BCU – Minister’s Dashboard 26 June 2025
BCU – Minister’s Dashboard 3 July 2025
BCU – Minister’s Dashboard 31 July 2025
BCU – Minister’s Dashboard – 28 August
BCU – Minister’s Dashboard – 04 September
BCU – Minister’s Dashboard – 18 September
BCU – Minister’s Dashboard – 2 October
BCU – Minister’s Dashboard – 16 October
BCU – Minister’s Dashboard – 30 October
BCU – Minister’s Dashboard – 13 November
Miscellaneous
BCU Chronology Memo
BCU Project Risks and Issues extract (from Project Online) - dated 14 NOV 25
FRaaS - Workflow Comparison v1.0
List of PMs and Project Sponsors
NEC Billing to Project/BAU
List of DGB Members from August 2022 to December 2025
BCU Org Chart as of 01 November 2025
Identity Management - Next Steps Plan - Draft 0.3
REQ-0024969 Biometric Capability Update (BCU) Project - Project Update and Go-forward options (signed by Minister Willis)
Workflow comparison v1.0
2025 Approved Terms of Reference - Delivery Governance Board
20251028 Business Change Management update
All BCU Content from DGB Minutes 2022-2026
IDME Fingerprint Enhancements Approach plan
IDme Biographic Enhancements Approach plan
IDme Rescaling – Feedback (Datacom)
Idme_IGMS rescaling NEC Estimates
Biometix IDme Rescaling EMO FINAL
FINAL Biometix IDme Rescaling Project Service Owner Consultation Review 20181109'
BCU QAT Feedback 25022026
NEC Contracts and Commercial Documents
New MSA that was 'parked' (and not signed) - dated 28 MAR 25
BCU SoW - dated 25 AUG 20
IPE SoW - dated 18 DEC 20
BCU EULA - dated 13 NOV 23
T&M Agreement (Options Paper Assistance) - dated 28 NOV 23
IPE EULA (not dated or signed)
IPE SoW Variation V3.1 (unsigned) dated DEC 24
Original MSA dated 270619
BCU SoW Variation - dated MAR 20
T&M Agreement Variation/Extension - dated 30 JAN 24
MBIE Options engagement Lt
Professional Services Terms - Short Form
MBIE IPE SOW Update - V0.5
Variation Agreement - BCU SOW Signed
BCU Eula Comfort Letter - dated 14 OCT 25
BCU Support SoW - dated 14 OCT 25
2 x Emails for context: NEC Email to MBIE with Bundled documents and MBIE's response re Bundle
IPE EULA Comfort Letter - dated 14 OCT 25
IPE SoW Variation 3.2 restatement - dated 14 OCT 25

NECAM Rate Card dated 09 OCT 25
Previous IQA Reports
May 2021 IQA Report
Sep 2022 IQA Report
Sep 2023 IQA Report
May 2024 IQA Report
May 2024 EY Review
July 2024 EY Update
May 2025 EY Review
October 2025 Review
October 2020 - Internal Health Check
Deloitte Review (Walled Garden)
Deloitte Password (saved as a .png snip)
Project Change Requests
Biometric Capability Update Business Case
06. IDme Rescaling In Person Enrolment Sub-Project Business Case v1.3
3644 BCU short form CR01 v1.0 APPROVED
09. 3644 - BCU CR02 Change Request 3Jul2020 Update01
_20200806 Memo_BCU project Scope, Funding and Delivery Approach_DCEI_CFO ...
3644 - BCU Project Change Request 03 Final For ICDC
1. 3644 - BCU Project Memo ICDC Change Request 03 Conditional Feedback
3644 BCU Project Change Request 04 v3_clean
Item 04 3644 Biometric Capability Update - Memo to Delivery Governance Forum
3644 Biometric Capability Upgrade Change Request 5
3644 BCU Change Request 05 - CR Playbook
April 2024 - Item 04.1 3644 Biometric Capability Update CR PMO Cover Memo
3644 BCU Change Request A3 CR06
3644 BCU Change Request 06 Playbook
FIC Endorsement for CR6 May 2024
Item 8a. FIC Memo3644 BCU 20052024 Final
December 2024 - Item 07.1 3644 Biometric Capability Update Change Request Cover Memo
3644 BCU Change Request 06.1 A3
3644 BCU Change Request 06.1 Playbook
Steering Group Minutes OCT 2020-SEP 2021
201006 BCU Project Steering Group Minutes
201021 BCU Project Steering Group Minutes
201105 BCU Project Steering Group Minutes
BCU HL Milestone Extract
201119 BCU Project Steering Group Minutes
201202 BCU Project Steering Group Minutes
201215 BCU Project Steering Group Minutes
210128 BCU Project Steering Group Minutes
210215 BCU Project Steering Group Minutes
210225 BCU Project Steering Group Minutes
210311 BCU Project Steering Group Minutes
210325 BCU Project Steering Group Minutes
210408 BCU Project Steering Group Minutes
210422 BCU Project Steering Group Minutes
210504 BCU Project Steering Group Minutes
210518 BCU Project Steering Group Minutes
210601 BCU Project Steering Group Minutes
210615 BCU Project Steering Group Minutes
OOTB Diagram BCU v2 - NEC Tabled at Mtg
2106029 BCU Project Steering Group Minutes
NEC BCU Fortnightly Report 25062021
210713 BCU Project Steering Group Minutes
NEC fortnightly governance 090721
210727 BCU Project Steering Group Minutes
NEC fortnightly governance 230721
210810 BCU Project Steering Group Minutes

NEC fortnightly governance 060821
210824 BCU Project Steering Group Minutes
210827 BCU Project Status Report
NEC fortnightly governance 200821
210907 BCU Project Steering Group Minutes
NEC fortnightly governance 030921
210921 BCU Project Steering Group Minutes
3644 - BCU Governance Group 21 Sept 21
MBIE fortnightly governance 170921
Steering Group Minutes OCT 2021-SEP 2022
211006 BCU Project Steering Group Minutes
MBIE fortnightly governance 011021
211019 BCU Project Steering Group Minutes
MBIE fortnightly governance 151021
211102 BCU Project Steering Group Minutes
MBIE fortnightly governance 291021
211122 BCU Project Steering Group Minutes - Final
211122 BCU Project Steering Group Minutes - NEC
MBIE fortnightly governance 121121
211130 BCU Project Steering Group Minutes - Final
MBIE fortnightly governance 261121
211214 BCU Project Steering Group Minutes - Final
211126 BCU Project Status Report
MBIE fortnightly governance 101221
220201 BCU Project Steering Group Minutes Final
BCU Project Status Report 20220128
MBIE NEC fortnightly governance report 28012022
220208 BCU Project Steering Group Minutes Final
20220208 BCU Project Status Report
MBIE fortnightly governance 20220204
220222 BCU Project Steering Group Minutes - Final
MBIE Fortnightly Governance Report 20220218
220308 BCU Project Steering Group Minutes - Final
20220303 BCU Project Status Report
20220304 MBIE Governance Report
220322 BCU Project Steering Group Minutes - Final
20220318 MBIE Governance report
220405 BCU Project Steering Group Minutes - Final
20220405 BCU Project Status Report
20220401 MBIE Governance report
20220415 MBIE Governance report (No meeting for 220419)
220503 BCU Project Steering Group Minutes - Final
20220428 BCU Project Status Report
20220429 MBIE Governance report
20220517 BCU Project Steering Group Minutes - Final
20220513 MBIE Governance report
20220531 BCU Project Steering Group Minutes
20220523 BCU Project Status Report
20220527 MBIE Governance report
20220614 BCU Project Steering Group Minutes - Final
20220610 MBIE Governance report
20220628 BCU Project Steering Group Minutes
20220622 BCU Project Status Report
20220623 MBIE Governance report
20220712 BCU Project Steering Group Minutes
20220708 MBIE Governance report
20220726 BCU Project Steering Group Minutes
20220722 MBIE Governance report
20220805 MBIE Governance report (No meeting for 220809)
20220823 BCU Project Steering Group Minutes2

20220817 BCU Project Status Report
20220819 MBIE Governance report
20220906 BCU Project Steering Group Minutes - MBIE
20220905 BCU Project Status Report MBIE
20220902 - MBIE Governance report
20220920 BCU Project Steering Group Minutes - MBIE
20220920 BCU Project Status Report MBIE FINANCIAL
20220916 - MBIE Governance report
Steering Group Minutes JAN-DEC 2025
20250114 BCU Project Steering Group Meeting Papers
20241210 BCU Project Steering Group Minutes-MBIE Only
28 JAN 2025 BCU Project Steering Group Meeting Papers
14 JAN 2025 BCU Project Steering Group Minutes-MBIE Only
11 FEB 2025 BCU Steering Group Meeting Papers
28 JAN 2025 BCU Project Steering Group Minutes-MBIE Only
25 FEB 2025 BCU Steering Group Meeting Papers
11 FEB 25 BCU Project Steering Group Minutes-MBIE Only
11 MAR 25 BCU Project Steering Group Meeting Papers
25 FEB 25 BCU Project Steering Group Minutes-MBIE Only
25 MAR 25 BCU Project Steering Group Meeting Paper
11 MAR 25 BCU Project Steering Group Minutes-MBIE Only
08 APR 25 BCU Project Steering Group - Meeting Papers
25 MAR 25 BCU Project Steering Group Minutes-MBIE Only
22 APR 25 BCU Project Steering Group - Meeting Papers
06 MAY 2025 BCU Steering Group - Meeting Papers
22 APR 25 BCU Project Steering Group Minutes-MBIE Only
20 MAY 2025 BCU Steering Group - Meeting Papers
03 JUN 2025 BCU Steering Group - Meeting Papers
20 MAY 25 BCU Project Steering Group Minutes-MBIE Only
17 JUN 2025 BCU Steering Group - Meeting Papers
03 JUN 25 BCU Project Steering Group Minutes-MBIE Only
01 JUL 2025 BCU Project Steering Group Meeting Papers
15 JUL 25 BCU Project Steering Group Meeting Papers
01 JUL 25 BCU Project Steering Group Minutes-MBIE Only
29 JUL 2025 BCU Steering Group - Meeting Papers
15 JUL 25 BCU Project Steering Group Minutes-MBIE Only
12 AUG 2025 BCU Steering Group - Meeting Papers
26 AUG 2025 BCU Steering Group - Meeting Papers
12 AUG 25 BCU Project Steering Group Minutes-MBIE Only
09 SEP 2025 BCU Steering Group - Meeting Papers
23 SEP 2025 BCU Steering Group - Meeting Papers
09 SEP 25 BCU Project Steering Group Minutes-MBIE Only
07 OCT 2025 BCU Steering Group - Meeting Papers
23 SEP 2025 BCU Project Steering Group Minutes - MBIE Only
14 OCT 2025 BCU Steering Group - Meeting Papers
07 OCT 2025 BCU Project Steering Group Minutes - MBIE Only
21 OCT 2025 BCU Steering Group - Meeting Papers
28 OCT 2025 BCU Steering Group - Meeting Papers
4 NOV 2025 BCU Steering Group - Meeting Papers
18 NOV 2025 BCU Steering Group - Meeting Papers
02 DEC 2025 BCU Steering Group - Meeting Papers
16 DEC 2025 BCU Steering Group - Meeting Papers
16 DEC 2025 BCU Project Steering Group Minutes - MBIE Only
Steering Group Terms of Reference
BCU Steering Group ToR V1.0
BCU Steering Group ToR V2.0
BCU Steering Group ToR V3.0
BCU Steering Group ToR V4.0
BCU Steering Group ToR V5.0
BCU Steering Group ToR V6.0

BCU Steering Group ToR V7.0
BCU Steering Group ToR V7.1
BCU Steering Group ToR V7.2
BCU Steering Group ToR V7.3
Test Documents
BCU Performance Test Plan-approved APR 25
BCU Regression Test Exit Report V0.1 OCT 25
BCU Regression Test Plan 1.1 -OCT 25
BCU SIT Test Summary Report v0.4 NOV 25
Early AMS release - Test Summary v1.0 SEP 20
Early BCU Changes Test Summary Report Final - NOV 20
MBIE AMS-BCU-ADEPT code merge release 2.0.0 Test Exit Report V0.1 JAN 22
MBIE BCU Early Pre-migration Business Context DB16 Rel 1.2 Test Exit Report V1.0 SEP 21
MBIE BCU Non-Functional Test Plan - MAR 23
MBIE Biometric Capability Update Test Plan Jun 23
MBIE Biometric Capability Update Test Strategy Final MAY 23
2025 Approved Terms of Reference - Delivery Governance Board
20251028 Business Change Management update
All BCU Content from DGB Minutes 2022-2026

Appendix 2 Timeline of Key Activities for BCU & IPE

Timeline BCU and IPE

2018–2019: Initiation and Business Case Approvals

- Nov 2018: Biometric Enhancement workstreams commenced to modernise the IDme platform.
- Mar 2019: Single-stage IPE Business Case approved (Capex \$2.26m; WOLC \$3.94m).
- Jun 2019: First governance report presented to the INZ Reference Group; governance structure and membership were not yet formalised.
- Jun 2019: Master Services Agreement with NEC signed.
- Aug 2019: BCU Business Case approved (Capex \$10.46m; WOLC \$19.49m).
- Sep 2019: IPE Business Case approved.

2020: Early Delivery Issues and Major Scope Change

- Feb 2020: Covid-19 triggered financial pressure and contributed to a shift toward larger system replacement approach.
- May 2020: First available Reference Group minutes; early concerns emerged about solution viability.
- May 2020: CR1 approved, consolidating scope and increasing WOLC to \$21.4m.
- Aug 2020: CR2 approved, significantly expanding scope from an upgrade to a full replacement of the IDme system and merging IPE into BCU. Go-live moved to Feb 2021.
- Sep 2020: Reference Group disbanded; governance transitioned to a newly established BCU Steering Committee.
- Dec 2020: IPE Statement of Work approved.

2021: Requirements Re-work and Increasing Risks

- Apr 2021: Consolidated BCU business requirements produced and underwent constant iteration through to 10/06/2023.
- Jun 2021: IQA noted significant delays and stressed the need for clearer scope definition.
- Nov 2021: Ministerial approval for CR3; WOLC increased to \$30.4m and go-live moved to July 2023.

2022: Continued Delays and Establishment of New Governance

- Aug 2022: Delivery Governance Board (DGB) began oversight of BCU.
- Sep 2022: CR4 approved, citing ongoing vendor delays; go-live moved to Aug 2023 (WOLC \$31.9m).
- Oct 2022: IQA indicated delivery remained possible but required strong governance discipline.

2023: Rising Delivery Concerns and First Project Pause

- Jun 2023: CR5 approved; further delays attributed to NEC's progress on security and migration activities. Go-live moved to Nov 2023 (WOLC \$31.95m).
- Jul 2023: Joint Ministers increased WOLC to \$35m.
- Oct 2023: IQA rated delivery confidence as unlikely and questioned continuation.

- Nov 2023: Project formally paused for four weeks to reassess options; later restarted with a revised go-live of Nov 2024.

2024: Escalation, Ministerial Concerns, and Scope Realignment

- Mar 2024: Minister challenged advice provided on project status and rising costs.
- Apr 2024: CR6 (first version) drafted, projecting BCU WOLC ~\$40m and recommending separation of BCU and IPE.
- Apr 2024: MBIE CEO issued a formal apology for the quality and accuracy of March ministerial advice.
- May 2024: DGB endorsed returning BCU to its original scope and re-establishing IPE as a separate project.
- Aug–Oct 2024: Despite ongoing testing instability and defect trends, reporting indicated the project remained within the \$35m threshold.
- Sep 2024: Go-live postponed to April 2025 due to defect volume and schedule pressure.
- Dec 2024: CR6.1 approved: BCU cost set at \$34.4m; IPE at \$8.53m.

2025: Testing Instability, Ongoing Replanning, and Final Discontinuation

- Feb–Apr 2025: Continued delays to MVP readiness, testing cycles, and security remediation; go-live dates repeatedly pushed out.
- Jun 2025: Executive decision (outside governance) moved go-live to Nov 2025.
- Aug–Oct 2025: Reviews identified **Commercial Information, Negotiations**, unresolved defects, performance failures, and high operational risk.
- Nov 2025: Project paused again to enable major replanning.
- Dec 2025: Project discontinued following advice to Joint Ministers.