



Te Tauāki Whanonga mō te Rāngai Tūmatanui | Code of Conduct for the Public Sector

**Consultation on the draft Code: summary and
submissions analysis**

3 February 2026



Submissions summary

This document outlines the results of consultation on the draft ***Te Tauāki Whanonga mō te Rāngai Tūmatanui | Code of Conduct for the Public Sector (the Code)***. More information is on our website: [The Code of Conduct for the Public Sector: Information for Public Sector organisations](#).

Consultation on the draft Code ran from 2 September 2025 to 17 October 2025. We received **69 submissions in total** via online survey and email, including one joint submission from two public sector organisations and another joint submission from two health professional bodies. We heard from:

- **50 Public Sector organisations** the Code applies to, including 27 public service departments and departmental agencies, 9 Crown agents, 11 Crown entities, 2 Schedule 4A Public Finance Act companies, and the Parliamentary Counsel Office
- **8 other organisations** such as unions and professional bodies, and
- **13 individuals** including public servants and academics.

Many of these were from organisations and individuals who we engaged during development of the draft Code, prior to running consultation.

Overall, there was **positive support for introduction of the Code** to replace the [Standards of Integrity and Conduct](#). Key themes identified across the feedback, which were raised by multiple submitters are outlined below. Alongside the key themes are our comments on how we addressed the feedback received – whether through revisions made in the final Code or through implementation support.

Key themes and comments

1. Standards and related guidance

- Many submitters proposed revised wording for specific standards and/or the related guidance.

Comment:

- We have revised several standards to, for example, modernise language, improve readability, and better reflect how the standards are applied in day-to-day work.



Where relevant, we also revised the guidance text that relates to the standards and other parts of the Code.

- The following table outlines changes we made to the standards:

Standard	Consultation version	Final version
3	We avoid activities, work or non-work, that compromise trust in our ability to do our job or that may bring our organisation or the Public Sector into disrepute.	We avoid work and non-work activities that may compromise our ability to do our job.
4	We value and uphold the dignity of others.	We recognise and uphold the dignity of every person.
6	We act with care and respect, and do not engage in behaviour that is inappropriate or could harm others.	We act with care and respect, and do not behave in ways that are inappropriate or could harm others.
8	We disclose our relevant interests and appropriately manage all conflicts of interest.	We disclose our relevant interests and manage all conflicts of interest appropriately.
9	We never misuse our position to benefit or disadvantage others or ourselves.	We never misuse our position for personal gain or to benefit or disadvantage others.
16	We are politically neutral, which enables us to effectively serve current and future governments.	We act in a politically neutral manner, which enables us to effectively serve current and future governments.
20	We aim to make government information, decisions, and services more transparent and available.	We aim to make government information, decisions and services transparent, accessible and available.

2. Accessibility

- Many considered the change from a one-page Code with external guidance, to the draft Code with internal guidance could, for example, risk it not being engaged with or difficult to remember.



- Some suggested providing a summary of the Code and/or its standards to help with content recall, whether within the Code or as related resources.
- Some submitters asked that we define key terms, including those not commonly used or well understood, e.g., ‘Public Sector,’ ‘public servant,’ and ‘public power.’
- One submitter suggested bringing the Code to life through colour and other design elements, for impact and memorability.
- Some submitters felt that the Code would benefit from stronger connections to the range of roles across the Public Sector.

Comment:

- The revised Code with internal guidance is shorter than the existing *Standards of Integrity and Conduct* and its related external guidance. Consolidating the standards with guidance improves accessibility to all relevant information.
- We are developing summary materials as requested, to assist recall and engagement. These will be available on our website.
- Key terms are **bolded** at first use and defined in the glossary.
- The Code has been visually designed to be engaging and to support content recall. It includes illustrations of public servants at work to signal a broad range of roles that public servants perform.

3. Te Tiriti o Waitangi | The Treaty of Waitangi and the Māori Crown relationship

- Some submissions noted the draft Code was silent on Te Tiriti o Waitangi | the Treaty of Waitangi, and proposed it be included and/or reference be made to the Māori Crown relationship.
- Some submissions pointed to section 14 of the Public Service Act 2020 (**the Act**), which provides that the role of the Public Service includes supporting the Crown in its relationships with Māori under the Treaty of Waitangi.

Comment:

- We identified possible options to reference Te Tiriti o Waitangi | the Treaty of Waitangi and/or the Māori Crown relationship, in consultation with the Crown Law Office. Relevant text has since been added to the introduction section of the Code to reflect section 14 of the Act. This has also been carried through to content about long-term workforce planning and capability.



- A key consideration for how to reference this was ensuring suitability of text to all Public Sector organisations that the Code applies to, while setting clear expectations that align with the Act and the Crown's obligations to Māori under the Treaty.

4. Human rights

- There was strong feedback on the proper limitation on public servants' rights at work and outside of work, particularly in relation to political activity.
- The interface between political neutrality requirements and other professional obligations, particularly for members of professions/health practitioners, was a key concern raised, i.e., striking the right balance and recognition of statutory rights.
- Bespoke guidance for those with multiple professional obligations was proposed in some submissions, particularly for health professionals.
- Some felt strongly that the Code's standard to address possible harm to the reputation of the Public Sector or relevant organisation was an unnecessary intrusion into private lives.

Comment:

- Working as a public servant in the Public Sector is a privilege and unlike other work in the private sector. At times, it requires limitations on rights including political activity rights (e.g., freedom of expression) to maintain public trust and confidence. We have conducted a legal review prior to finalising the Code's content, including for consistency with the New Zealand Bill of Rights Act 1990.
- We will develop scenario-based guidance to support the Code's implementation for those with additional professional obligations, with an initial focus on the health sector.
- We amended standard 3, as above. However, reputation of the organisation or the Public Sector may still be relevant to any particular case under employment law.

4. Alignment with legislation

- Some submissions considered that the Code's descriptions of public service values and principles – which were used as the framework for the Code's standards – could better reflect the Act.
- Some considered the change from grouping the current Code's standards under four values, to the consultation draft Code's grouping of standards by the ten public service values and principles, may make it harder to remember.



Comment:

- Rather than just a reference to the relevant sections of the Act, we have now included the descriptions of each public service value and principle within the introduction section of the Code. The statutory descriptions are further articulated within the relevant sections of the Code.
- We used the ten public service values and principles as the organising framework within which to group the Code's standards. These reflect the values and principles outlined in the Act.

5. Compliance and breaches

- Some submitters sought clarification on how the Code provides for identification and resolution of integrity and conduct concerns/breaches of the Code.

Comment:

- The 'Abiding by our Code' section outlines expectations for public servants and leaders around compliance, what may be considered a breach, and how anyone may speak up to raise integrity and conduct concerns.
- Agencies are expected to have policies and procedures in place to support identification and resolution of integrity and conduct concerns as part of their implementation compliance. This is affirmed in the same section of the Code, with responsibility sitting with the relevant organisational leader.

6. Implementation

- Many submitters had questions about how the Code would be implemented, including how much time would be provided to update relevant agency policies and procedures, and what additional support or resources would be available to support understanding and embedding of the changes.
- Some submitters wanted to know more about how the Code relates to their agency code.
- Many submitters also sought clarity about the new training requirement. For example, whether there are associated reporting requirements, how the Code training would be provided, and expectations around when training must be commenced and completed considering other core business functions.

Comment:



- The Code was issued on 3 February 2026 and is taking effect from 30 March 2026. This provides a period within which to identify what changes are needed within agencies to comply with it. Most of the standards are carried forward from the previous *Standards of Integrity and Conduct*, with minor changes to better clarify the intent, or are standards that reflect existing practice.
- We have developed resources and key communications to help support understanding and embedding of the changes. These are published on our website here: [The Code of Conduct for the Public Sector: Information for Public Sector organisations](#).
- The Leadership Development Centre (LDC) is developing learning modules on the Code and general election. These are required learning modules to be completed as a priority to support understanding of the Code and appropriate conduct during an election year (i.e., 2026).
- We are providing key information about learning expectations to agencies, who in turn will communicate the requirements to their staff. This will include information about how and when training must be completed.
- Agencies must comply with the Code's standards and may apply additional standards to their own context that are consistent with the Code. This generally means that compliance with an agency code will result in compliance with the Code.