



<b>Report Title:</b>	<b>Action plan to strengthen integrity – Implementation update</b>		
<b>Report No:</b>	<b>MoSR 2026-0025</b>		
<b>Date:</b>	<b>4 February 2026</b>		
<b>To:</b>	<b>Hon Judith Collins KC, Minister for the Public Service</b>		
<b>Action Sought:</b>	<b>Note, agree and discuss</b>	<b>Due Date:</b>	<b>10 February 2026</b>
<b>Contact Person:</b>	<b>Kate Salmond, Chief Advisor, Strategy, Policy and Integrity</b>		
<b>Contact No:</b>	9(2)(a) [REDACTED]		
<b>Encl:</b>	Appendix 1: Reactive talking points re: the action plan and Anti-Corruption Taskforce report	<b>Priority:</b>	Low
<b>Security Level:</b>	<b>IN CONFIDENCE</b>		

### **Executive Summary**

1. In May 2025 you agreed our *Action plan to strengthen integrity* ('action plan') to reset the public sector's approach to strengthening integrity and agreed to six monthly progress reporting (MoSR-2025-0373 and MoSR-2025-0449 refer). You used the action plan to develop the fifth Open Government Partnership national action plan (OGP NAP5, MoSR-2025-0798 refers).
2. This report provides an action plan implementation update for the six months to December 2025. Notable highlights include:
  - a. Publication of refreshed Speaking Up model standards and Your Complaint, Your Rights and engagement sessions with senior public service leaders,
  - b. Publication of template conflict of interest management plans and scenarios, with engagements to help agencies embed this into practice,
  - c. Issuing the new Code of Conduct for the public sector and launching mandatory 'Integrity Essentials' learning (MoSR-2026-0001 refers), and
  - d. Conclusion of the Anti-Corruption Taskforce Pilot (led by the Serious Fraud Office), with a report on post-Pilot findings and possible next steps.
3. Priorities for the coming year are to embed the refreshed Code of Conduct and accompanying mandatory integrity learning, progress OGP NAP5 commitments around transparency of senior leaders' conflicts of interest and ethical transitions between the public and private sector, and support agencies to prepare for mandatory reporting of misconduct investigations (subject to progress of the Public Service Amendment Bill).
4. We do not recommend any adjustments to the action plan. Now that implementation is well established and six-monthly reporting for OGP NAP5 will start this year, we will report annually on this action plan and provide initiative-specific updates as needed.

## Recommended Action

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We recommend that you:

- a **note** that implementation of the *Action plan to strengthen integrity* is on track and does not require any adjustment,
- b **agree** that since implementation is now established, we will report six-monthly on OGP NAP5 commitments and annually on the action plan overall,  
*Agree / disagree*
- c **note** that we will make minor updates to the published action plan and information on our website to reflect that some 'go further' actions are now agreed as NAP5 commitments,
- d **agree** that, as an exception to our new process, we publish this report (excluding the appendix) alongside the published action plan on our website to be transparent about our progress,  
*Agree / disagree*
- e **discuss** any feedback on progress to date and activities prioritised for the coming year  
*Agree/disagree.*

Hon Judith Collins KC  
**Minister for the Public Service**

## Purpose of Report

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5. Our [Action plan to strengthen integrity](#) ('the action plan') is resetting the public sector's approach to strengthening integrity (MoSR-2025-0373 and MoSR-2025-0449 refer). This report provides an implementation update, as previously agreed, for the six months to December 2025, and outlines next steps and priority activities for the coming year.

## Background

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6. The action plan supports the Public Service Commissioner's integrity function and broad integrity work programme, and your ambition for a high-performing and trusted public service that makes better, fairer decisions that deliver for New Zealand.
7. It has four broad focus areas with a suite of targeted actions:
  - a. Reset expected standards of integrity and conduct and drive agency practice,
  - b. Improve conflict of interest identification and management,
  - c. Improve complaints management within agencies, and
  - d. Progress domestic / international commitments to reduce corruption and fraud.

8. You used the action plan to guide the development and content of the Open Government Partnership fifth national action plan ('OGP NAP5') (EXP-25-MIN-0074 and MoSR-2025-0798 refer). During NAP5 consultation, we worked with stakeholders to re-scope some 'go further' actions as NAP5 commitments.
9. We committed to monitor shifts in Public Service Census results and other external measures to evaluate the impact of the action plan. The 2025 Public Service Census set the baseline for future reporting and no other relevant measures have been published in this reporting period.

## **Analysis**

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10. We have made good progress on implementation with most actions complete or on-track for completion within proposed timeframes. Key milestones are described below.

### **Reset expected standards of integrity and conduct and drive agency practice**

#### *Re-issue Code of Conduct [2025/26 – On track, expected completion Mar 2026]*

11. The Commissioner issued a new Code of Conduct for the public sector on 3 February 2026, to take effect from 30 March 2026 (MoSR-2026-0001 refers). Agencies will report to us on how they will implement the Code.
12. The new Code includes clearer expectations around respectful/appropriate behaviours, merit-based appointments and integrity culture and has a more user-friendly format. As required by the Public Service Act 2020, we consulted with every agency to which the Code will apply (124 agencies) and received broad support.

#### *Mandatory baseline integrity learning [2026 – On track, expected completion Sept 2026]*

13. The Code will be accompanied by mandatory 'Integrity Essentials' learning for all public service agencies, developed with the Leadership Development Centre.
14. Agencies must roll-out required learning as soon as possible this year and assure us that it has been completed and is embedded in future staff inductions.
15. Resources, communication materials and advice will be available to Integrity Champions to support them in sharing and embedding the new Code within their agencies.

#### *Identify system/agency trends and opportunities from Public Service Census and support*

#### *Integrity Champions to improve practice [2025/26 – On track, expected completion end 2026]*

16. In June 2025, we reflected on Census results with Integrity Champions, and encouraged them to support chief executives on agency-level response plans.
17. In July 2025 we published the Public Service Census (Census) results and our system response plan. The integrity actions in the response plan drew on this action plan.
18. We received, reviewed and provided feedback on 32 agency response plans (7 are draft or pending). Response plans are monitored via chief executive performance processes.
19. In late 2025, Integrity Champions participated in research by Victoria University of Wellington on the community of practice, with the final report expected to be published in early 2026.

*Refine and make better use of system and agency data to monitor integrity practice*

[2026/27 – Scoping brought forward]

20. We brought forward the start date for this action as it was also recommended by the Office of the Auditor-General's audit of our work to promote integrity. We are reviewing existing data collections and scoping possible new/changed collections.
21. We have also been in discussion with the OECD about participation in *Public Integrity Indicators* programme, which assesses national public integrity systems and integrity and anti-corruption initiatives against OECD benchmarks.

### **Improve conflict of interest identification and management**

*Develop template conflict of interest (Col) management plans and scenario-led learning*

[2025/26 – Complete]

22. In September 2025 we published conflict of interest template management plans and scenarios to help agencies improve their practice (133 downloads since publication).
23. Scenario-led conflict of interest learning was developed to complement the template. It is available now through the Leadership Development Centre for agency adoption.

*Embed improved conflicts of interest identification and management practices through Integrity Champions* [2025/26 – On track, expected completion end 2026]

24. In February 2025, as part of our system response to the findings of the *Inquiry into the protection of personal information*, we published updated Conflict of Interest model standards and a one-page conversation guide for managers (visited 2,695 times by around 1000 unique users since publication).
25. In July 2025, all public service chief executives assured the Public Service Commissioner that they had adopted the new model standards and were making improvements.
26. Integrity Champion meetings in February, June, September and November 2025 also explored conflict of interest work, and the products reflect their requests for support.

*Explore options to increase transparency of chief executive and board chair interests & management plans* [2026/27 – Approved as OGP NAP5 commitment, Scoping underway]

27. OGP NAP5 Commitment 4 will *Explore options to improve transparency of senior leaders' conflicts of interest*. During 2026 we will research the problem, scope possible solutions (including privacy implications) and consult stakeholders.
28. The need for this work has been highlighted by the current Teaching Council investigation. We will consider fast-tracking work on this commitment as part of a system response.

*Explore options to strengthen transparency around lobbying/'revolving doors' for senior public service leaders [2026/27 – Approved as OGP NAP5 commitment, Scoping underway]*

29. OGP NAP5 Commitment 3 will *Support ethical government – private sector career transitions*. During 2026 (before the general election) we will work with the Ministry of Justice (MoJ) to produce a discussion document that explores the movement of individuals between government and private sector roles, and options for ethical transitions.

### **Simplify and improve complaints management**

*Strengthen agency practice around complaints management and 'Speaking up' processes/practices [2025/26 – Complete, but further work may be scoped]*

30. In September 2025 we published refreshed Speaking Up model standards and *Your Complaint, Your Rights* (MoSR-2025-0639 refers). These set the expectation that any form of bullying, harassment, or discrimination is unacceptable, outline complainants' rights, and set expectations for how agencies support individuals who raise concerns.
31. The *Your Complaint, Your Rights* webpage was viewed 1,576 times since publication, with 208 downloads of the full resource. The Speaking Up Model Standards webpage was viewed 1,721 times since publication of the updated model standards, with 410 downloads of the full resource. Average engagement times suggest website users were engaging with the detail on these pages.
32. To support adoption by senior leaders we led or contributed to a range of engagements that included: a session for public service chief executives focused on workplace culture and the barriers to speaking up (Oct 2025); a session with Integrity Champions on speaking up and complaints management (Nov 2025); and a facilitated discussion with government Health, Safety and Wellbeing leads about agency experiences of managing/responding to behaviour-based complaints (Dec 2025).
33. Beyond advice and support to agencies, no further work is currently planned, but some may be scoped when we review protected disclosures practice (see below).

*Implement amendments to the Public Service Act 2020 around mandatory agency reporting of integrity and conduct investigations [2026/27 – On track]*

34. We are drafting guidance for agencies on implementing the reporting, and expect to undertake targeted consultation in early 2026. We aim to issue guidance shortly after the Public Service Amendment Bill is enacted, with reporting starting July 2027.

*Policy review of Protected Disclosures (Protection of Whistleblowers) Act 2022 and related practices [2026/27 – Approved as OGP NAP5 commitment, Scoping underway]*

35. OGP NAP5 Commitment 1 will *Review protected disclosures practice* within public sector agencies, publishing information on the consequences for retaliation, and scoping a community of practice for organisations receiving disclosures.

## Progress domestic/international commitments to reduce corruption and fraud

### *Contribute to the Anti-Corruption Taskforce pilot activities (SFO-led) [2025/26 – Complete]*

36. During 2025 we supported the Serious Fraud Office (SFO) to deliver the Taskforce pilot. The pilot's report will be published on 9 February 2026 (joint briefing MoSR-2026-0015 refers, it includes a draft press release and talking points). We will provide further advice on next steps.
37. In the event of media enquiries, **Appendix One** contains proposed reactive talking points about how the action plan is helping the public sector to respond to the report's findings.
38. OGP NAP5 Commitment 2 (led by SFO) will *Develop a Corruption Risk Assessment Tool* to support public sector agencies to identify corruption and insider threat risks and take mitigation steps. This work leverages the insights gained from the Pilot. A first draft of the Tool is expected in mid-2026, and a final version in 2027.

### *Support implementation of recommendations from the United Nations Convention Against Corruption (UNCAC) peer review (MoJ-led) [2025/26 – Not started]*

39. During 2025 we supported MoJ to provide evidence of New Zealand's adherence to UNCAC. A draft executive summary was received for feedback in October 2025. We expect finalised recommendations early in 2026, and will scope next steps on this action after further discussion with MoJ.

### *Explore policy options for re-starting work to implement a beneficial ownership register (MBIE/MoJ-led) [2026/27 – Paused]*

40. Work on a beneficial ownership register was not progressed in the package of amendments modernising the Companies Act 1993 and making other improvements for business. As far as we are aware, the Minister of Commerce and Consumer Affairs has not prioritised further work on this by agencies.

## Next Steps

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41. We do not recommend any adjustments to the action plan. Priorities for this year include:
  - a. Embedding the refreshed Code of Conduct and mandatory baseline integrity learning
  - b. Progressing NAP5 commitments to *Explore options to improve transparency of senior leader's conflicts of interest* and *Support ethical government – private sector career transitions* (with MoJ), and
  - c. Helping agencies prepare for annual reporting on misconduct investigations.
42. We will ensure action plan implementation is sustained alongside our 'business as usual' work, changes to the public service operating model, and the heightened integrity sensitivities that accompany a general election year.

43. Now that the action plan is established, and six-monthly OGP NAP5 reporting will also start shortly, we will report annually on the action plan's implementation. We will also publish this report (excluding the appendix) on our website, if you agree, and make minor updates to the action plan to reflect OGP NAP5 decisions.
44. We welcome your feedback on progress to date and priorities for the coming year.

9(2)(g)(i) free and frank

