



OPEN  
GOVERNMENT  
PARTNERSHIP  
NEW ZEALAND

# Fifth National Action Plan

2026 – 2027

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# Ministerial foreword

I am pleased to present New Zealand's Fifth Open Government Partnership (OGP) National Action Plan (NAP5).

New Zealanders deserve a government that is open, accountable and acts with integrity. These are core principles that underpin our democracy. Taxpayers expect the government to use their resources wisely, and it is important that they have a say in what the government does.

NAP5 reaffirms the Government's commitment to transparency, accountability and public participation. New Zealand has a strong reputation for integrity and openness – we intend to keep it that way. Our participation in OGP is one of many ways the government remains ready to respond to an evolving global context.

NAP5 builds on lessons learned from previous plans and aligns with government priorities and the focus areas of the *Action plan to strengthen integrity 2025 – 2028*, a work programme designed to lift integrity across the public sector. The four commitments in NAP5 support the goal of strengthening public sector integrity by reviewing protected disclosure practices, supporting agencies to assess their corruption risks, supporting ethical transitions between the public and private sectors, and improving transparency around senior public leader conflicts of interest.

I would like to thank all those involved in developing NAP5, particularly the members of the public and civil society who engaged in workshops and provided valuable feedback on draft commitments. Your perspectives have helped make this plan stronger and more effective.

**Hon Judith Collins KC**

Minister for the Public Service

December 2025



# Introduction

*New Zealand has a strong record on open government*

New Zealand is widely recognised as a world leader in openness and integrity of government and consistently performs well on both domestic and international measures of public trust. We rank near the top of Transparency International's Corruption Perceptions Index as one of the countries with the least perceived corruption, but our overall score has been declining in recent years – 2024 was the first time we have placed outside of the top three countries.<sup>1</sup>

However, 80% of people say they trust the New Zealand public service based on their personal experience<sup>2</sup> and New Zealanders are more likely than people in other Organisation for Economic Co-operation and Development (OECD) countries to believe that our political system allows them to have a say in what government does.<sup>3</sup> The ability to access information is another vital aspect of open government. New Zealand agencies' compliance with the Official Information Act 1982 (OIA) is consistently high: 97.7% of OIA requests were completed within legislated timeframes in the six months to June 2025.<sup>4</sup>

*OGP is part of our wider open government and integrity context*

Underpinning these results is a legislative and constitutional framework that supports integrity and open government. Our constitutional settings provide opportunities for public participation in government through agency consultations, submissions to Select Committees and participation in Commissions of Inquiry and Royal Commissions. Key pieces of legislation include the OIA and the Public Service Act 2020. The Public Service Act embeds open government as a public service principle. Proposed amendments to the Public Service Act that are currently before Parliament will further support public sector integrity by reinforcing the principles of political neutrality and merit-based appointments for public servants.

In addition to a strong constitutional and legislative underpinning, open government in New Zealand is reinforced by a robust integrity culture. In the 2025 Te Taunaki Public Service Census (the Census), 95% of public servants consider they have a good understanding of what it means to be politically neutral and 91% said it was important their organisation is open and transparent with the public.<sup>5</sup>

There is significant work underway across government to drive integrity performance and improve transparency. This includes the guidance issued earlier this year by the Government Chief Digital Office (GCDO) on the use of [GenAI](#) by the public service, as well as the Public Service Commission's [Action Plan to strengthen integrity 2025 – 2028](#), which proposes tangible actions to strengthen integrity performance across the public sector. New Zealand's involvement in OGP is another aspect of our integrity and open government work programme.

*Commitments focus on areas to strengthen and reflect civil society voices*

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<sup>1</sup> [Corruption Perceptions Index – Transparency International](#)

<sup>2</sup> [Kiwis Count Survey 2025 – Te Kawa Mataaho Public Service Commission](#)

<sup>3</sup> [OECD Survey on Drivers of Trust in Public Institutions 2024 Results - Country Notes: New Zealand – OECD](#)

<sup>4</sup> [Latest OIA statistics released – Te Kawa Mataaho Public Service Commission](#)

<sup>5</sup> [Integrity culture – Te Taunaki Public Service Census – Te Kawa Mataaho Public Service Commission](#)

Despite these strong foundations, new technologies and shifting public expectations mean New Zealand must continue to support good integrity and open government practices.

Ensuring people feel confident and safe to speak up when they witness serious wrongdoing in the workplace is important for an accountable, high-integrity public service. Participants in OGP workshops noted several ways to strengthen how disclosures are handled under the Protected Disclosures (Protection of Whistleblowers) Act 2022 (PDA). NAP5 includes a commitment to review agency practice when managing protected disclosures under the PDA, and the potential for a public sector community of practice for appropriate authorities. The Public Service Commission will lead this work.

An area highlighted by Transparency International New Zealand (TINZ) for further work is New Zealand's approach to deterring, detecting and exposing corruption.<sup>6</sup> Currently, public sector agencies may not know the extent to which they are at risk from corruption and insider threats. Building on the Serious Fraud Office (SFO) led Anti-Corruption Taskforce Pilot completed in December 2025, the SFO will lead a commitment to develop a Corruption Risk Assessment Tool to help agencies better identify, understand and mitigate these risks. This will increase public sector resilience to corruption and ensure taxpayer funds go where they are intended. It will also support New Zealand in meeting its international obligations to tackle corruption, including the OECD Anti-Bribery Convention.

Concerns about people moving between public senior government roles and private roles (known informally as “the revolving door”) has been identified as an integrity risk by the media, public, civil society groups and workshop attendees.<sup>7</sup> The transfer of highly skilled and experienced professionals between public and private roles can be positive and beneficial for all parties when managed well. NAP5 includes a commitment to develop and publish a discussion document to explore the movement of individuals (elected and non-elected) between government and private sector roles, including lobbying, and potential options to support ethical transitions. This commitment will be jointly led by the Ministry of Justice and the Public Service Commission.

Participants in OGP workshops also discussed the importance of a strong integrity culture, managing conflicts of interest and maintaining political neutrality. It is important that senior leaders have a good understanding of these and recognise the need to effectively disclose, and manage, any actual, perceived or potential conflicts that may arise. Despite obligations for chief executives and board chairs to disclose interests, there is no publication of declared interests or management plans, limiting transparency for the public. The Public Service Commission will lead a commitment to explore options to increase the transparency of senior public servants' conflicts of interests.

The commitments in NAP5 propose realistic and achievable goals to address a range of issues raised in OGP workshops and other feedback channels. Civil society representatives and officials have highlighted the importance of these commitments for supporting the principles of open government and upholding integrity in New Zealand.

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<sup>6</sup> [Transparency International New Zealand: An assessment of the effectiveness of anti-corruption institutions in New Zealand in deterring, detecting and exposing corruption](#)

<sup>7</sup> [Helen Clark Foundation, Shining a Light: Improving Transparency, A Balance of Voices: Options for the regulation of lobbying in New Zealand - Health Coalition Aotearoa](#)

# Our journey – the development of NAP5

New Zealand has been a member of OGP since 2013. This is New Zealand's fifth National Action Plan (NAP5). The Public Service Commission (the Commission) leads the development and coordination of National Action Plans on behalf of the Minister for the Public Service who is the lead for the government.

The Commission's approach to developing NAP5 builds on past experience, research, feedback from civil society and government agencies, and the recommendations from OGP's Independent Review Mechanism (IRM).

The IRM report for New Zealand's NAP4 (2022-2024) made a number of observations the Commission considered when developing NAP5:

- **Implementation relies on Ministerial buy-in and cross-party support.** Where commitments did not align with government priorities, they were less likely to be implemented successfully.
- **Adequate resourcing is needed to progress commitments.** Where commitments had inadequate resourcing progress and results slowed.
- **The OGP process depends on rebuilding government-civil society trust.** Trust is fostered through two-way communication, clear expectations and openness about opportunities and limitations. CSOs hesitated to participate due to lack of responsiveness to their suggestions.

The development of NAP5 aimed to address these observations in a number of ways.

Cabinet and the Minister for the Public Service were engaged and provided clear direction on the scope and focus areas for NAP5. Cabinet also delegated approval of the final plan to the Minister for the Public Service.

The direction on scope included aligning plan commitments to government priorities, agency work programmes, and the four focus areas of the Commission's *Action Plan to strengthen integrity 2025 - 2028*. This approach provided clarity for all participants, ensured greater agency ownership of commitments and adequate resourcing, increasing the likelihood of successful implementation. As with earlier NAPs, no additional funding is available for NAP5 commitments, with costs met from agency baseline funding.

In order to address the IRM's observation about building and maintaining trust with civil society stakeholders, the Commission proactively communicated the timing, co-design process, and scope for NAP5 to all stakeholders. The Commission reached out to a variety of CSOs, including some who had not previously been involved in OGP, Regional officials through the Regional Public Service Commissioner network, Public Service agencies and the public, inviting them to participate in the process. Potential stakeholders were contacted directly by email, in addition to publicising the plan over the Commission website, social media channels and OGP newsletter.

The NAP5 development process was shorter and more streamlined than that of NAP4 (which was extended in part due to COVID-19 related delays). This shorter timeline has helped ensure consistent communication and maintained the momentum of work. Experience with previous

NAPs has shown that an extended development timeline does not necessarily result in stronger commitments or results.

New Zealand did not establish a standing multi-stakeholder forum (MSF) for NAP5, instead opting to meet OGP's requirements for establishing a space for ongoing dialogue and collaboration by holding workshops and using the Commission's website as a space to share ideas. Stakeholders were also able to provide written input at any time. This approach provided anyone with an interest in open government and integrity to participate in the OGP process on an equal footing.

The decision was made to host workshops entirely online for NAP5 using an external facilitator. This was intended to enable nationwide participation, minimise costs for all participants and allow for a more streamlined process. Despite these efforts overall engagement was low with a small number of civil society organisations and members of the public and officials taking part.

#### *Timeline of NAP5 co-creation*

- **Early August 2025** – Cabinet endorsed the development of NAP5 and authorised the Minister for the Public Service to approve the final plan.
- **August – September** – officials scoped potential areas from commitments, based on reports from CSOs, the OECD and the IRM.
- **25 August** – the proposed approach to NAP5 was published on the Commission website.
- **4 September** – the first public information session was held, providing an opportunity for people to ask questions about OGP and NAP development.
- **11 September** – the first online workshop for NAP5 is held.
- **23 September** – the second online workshop for NAP5 is held.
- **October** – officials considered ideas received, assessed these against the *Action plan to strengthen integrity 2025-2028* and worked with relevant agencies to confirm support for commitments.
- **14 November** – officials published the draft commitments and provided reasoned responses for why other commitments ideas will not progress.
- **26 November** – the final workshop was held to discuss draft commitments and incorporate further feedback.
- **1 December** – officials published updated draft commitments including draft milestones (based on workshop feedback) for further feedback by 8 December.
- **9 December** – final feedback considered and plan updated.
- **11 December** – officials submitted the final plan to the Minister for the Public Service for approval.
- **19 December** – the Minister for the Public Service approved NAP5, and officials published it online. Reasoned responses for changes (made or not made) from final feedback were published.

## Our commitments

NAP5 is a balanced and practical plan for progress towards New Zealand’s open government ambitions. The commitments represent a strong spread of priorities and reflect the concerns and ideas shared during our co-creation process. They align with the scope and focus for the plan provided by Cabinet and the Minister for the Public Service. They tackle complex issues head-on, building on previous action plans while laying solid foundations for future progress. Above all, these commitments are realistic and deliverable, turning intent into impact.

No.	Commitment
1	<b>Review protected disclosures practice</b> (Public Service Commission)
	Undertake a practice review of the protected disclosures system, publish information on the consequences for retaliation, and scope a community of practice for organisations receiving disclosures.
2	<b>Develop a corruption risk assessment tool</b> (Serious Fraud Office)
	Design a Corruption Risk Assessment Tool for public sector agencies to identify corruption and insider threat risks within their organisation. The tool will assist agencies to take steps to mitigate these risks.
3	<b>Support ethical government – private sector career transitions</b> (Public Service Commission and Ministry of Justice)
	Produce a discussion document exploring the movement of individuals (elected and non-elected) between government and private sector roles, including lobbying, and identify potential options to support ethical transitions.
4	<b>Explore options to improve transparency of senior leaders’ conflicts of interest</b> (Public Service Commission)
	Research and scope options to improve transparency of conflicts of interest held by senior leaders in the public sector. Options could include an online register of interests (like the publication requirement for Ministers’ interests) or creating an independent review process for CE interest declarations.



## Review protected disclosure practice

<b>Country</b>	New Zealand
<b>Number and Name of the Commitment</b>	<b>1. Review protected disclosure practice</b>
<b>Brief Description of the Commitment</b>	Improve NZ's protected disclosures system by undertaking a practice review, publishing information on the potential consequences for retaliation, and scoping the practicality of a community of practice for public sector organisations receiving disclosures.
<b>Commitment Lead</b>	Te Kawa Mataaho Public Service Commission
<b>Supporting Stakeholders</b>	<ul style="list-style-type: none"> <li>• <b>Government:</b> Other agencies that receive protected disclosures.</li> <li>• <b>CSOs:</b> Potential CSOs include TINZ, Community Law Centres, New Zealand Council for Civil Liberties (NZCCL).</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> The Office of the Ombudsman; Academics undertaking research on disclosure practices (at Victoria University of Wellington and elsewhere); Other jurisdictions (to include Australia, UK); Potentially, large private sector entities who receive protected disclosures (for example banks or utility providers) or business representative networks</li> </ul>
<b>Period Covered</b>	2026-2027

### Problem Definition

#### 1. What problem does the commitment aim to address?

*Who is affected? Where is it taking place? How are they affected? When are they most affected? When did the problem start? How long has the problem impacted those affected?*

Protecting whistleblowers is critical to detecting and preventing serious misconduct in New Zealand and maintaining integrity. Research shows that reporting by employees is the single most important method by which illegal or corrupt activity in the workplace is brought to light.

The Protected Disclosures (Protection of Whistleblowers) Act 2022 (the Act) facilitates the disclosure and investigation of serious wrongdoing in the workplace (also known as whistleblowing) and provides protection for employees and other workers who report concerns. Te Kawa Mataaho Public Service Commission administers this Act.

New Zealand was one of the first countries in the world to introduce dedicated legislation to protect whistleblowers – the Protected Disclosures Act 2000. This system was updated through the 2022 Act which expanded the definition of wrongdoing, removed hurdles to disclosure outside the organisation, clarified protections for disclosers, and strengthened the requirements on authorities receiving disclosures, particularly their obligation to protect the identity of the discloser.

However, there are still improvements which could increase the effectiveness of New Zealand's protected disclosure system, and make sure that people can safely speak up when they see

serious wrongdoing. The [2025 Public Service Census](#) also indicated that public servants don't always feel safe to speak up about issues: Most people (90%) said they knew what to do if they experienced or witnessed wrongdoing or inappropriate behaviour, but fewer (70%) said they felt safe to speak up about those issues.

The co-creation workshops for NAP5 identified the following issues with New Zealand's protected disclosure system:

- Potential disclosers may lack information on, or feel deterred by, aspects of the protected disclosures system, such as the 'not in bad faith' requirement and the need to judge whether conduct qualifies as 'serious' wrongdoing.
- There is no data available to show whether or not the Act is achieving its aim of facilitating disclosures of serious wrongdoing and protecting people who disclose.
- There is a lack of clarity on the consequences when organisations unlawfully retaliate against whistleblowers. This could contribute to a lack of confidence in coming forward.
- Organisations which can receive protected disclosures ("appropriate authorities" under the Act) do not routinely share their practice and experience when considering protected disclosures. This could contribute to a lack of consistency in responses, and potentially non-compliance with the Act.

## **2. What are the causes of the problem?**

*Elaborate on your understanding of the causes of the problem. As much as possible, identify the root causes. Utilize problem analytical tools (e.g., problem tree, five whys, fishbone diagram, or other related methods) when necessary and provide evidence whenever possible.*

### *Lack of maturity in applying the provisions of the Act*

The Act provides for a wide range of organisations to receive protected disclosures as 'appropriate authorities.' It includes the head of any government organisation, any officer of Parliament<sup>8</sup>, and professional membership bodies. As a result, many appropriate authorities may only rarely receive protected disclosures and may lack maturity or knowledge in applying the protections in the Act. While the Act requires public sector organisations to have (and publish information about) internal procedures for dealing with protected disclosures, in practice there may be little awareness within organisations that these exist.

### *Barriers to sharing experiences*

Protected disclosures are confidential and sensitive. Because of this, the organisations responsible for handling them often don't know how to safely share their experiences or learn from each other. There is no official group or secure space to support this happening, while at the same time upholding the confidentiality of the disclosure.

### *People don't always feel safe blowing the whistle*

As noted above, potential disclosers may lack confidence that they will be adequately protected. Appropriate authorities / receivers of protected disclosures could use information

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<sup>8</sup> In New Zealand, an officer of Parliament means the Ombudsman, the Controller and Auditor-General, or the Parliamentary Commissioner for the Environment. Members of Parliament (including Ministers) are not officers of Parliament and are not appropriate authorities under the Act.

from the Public Service Census and feedback from disclosers to identify where best to target resources or strengthen processes to further reinforce that it is safe to speak up.

## Commitment Description

### 1. What has been done so far to solve the problem?

*What solutions were made available for this problem in previous years? How successful have they been?*

#### *Legislation updated 2022*

New Zealand's law protecting whistleblowers was updated in 2022. It introduced:

1. A broader definition of serious wrongdoing
2. Easier reporting requirements
3. Clearer responsibilities for those receiving disclosures
4. Stronger protections for whistleblowers (see above)
5. Clarity on internal processes for public sector organisations

Since these changes came into force, protected disclosures have increased. But there have also been reports, most recently the [OECD Anti-Bribery Convention Phase 4 Report on New Zealand](#), that tell us that the system could be improved.

#### *Guidance issued in 2025*

In September 2025 the Public Service Commission released:

- Updated [Speaking Up model standards](#), which set out the expectations on public sector organisations to support effective reporting and managing of wrongdoing concerns; and
- New guidance for complainants: [Your Complaint, Your Rights](#), to help people understand their rights when speaking up about bullying, harassment, or discrimination in public sector workplaces.

Also in 2025, the Office of the Ombudsman published guidance for receiving and dealing with protected disclosures: [Guidance for receivers | Ombudsman New Zealand](#).

#### *Increasing number of protected disclosures*

The number of protected disclosures being made is increasing. In June 2025, the Office of the Ombudsman recorded a 300 percent increase in protected disclosures matters since the 2022 Act came into force.<sup>9</sup> This may reflect the expanded eligibility under the 2022 Act, but could also point to a greater awareness of the protections offered or a greater understanding of what constitutes serious wrongdoing at work. This increasing number of protected disclosures makes it more important that disclosures are handled fairly, consistently, and in accordance with the requirements in the Act. The problems cited above may mean that this is not happening.

### 2. What solution are you proposing?

*What will you do to solve the problem? How does this differ from previous efforts? In what way will the solution solve the problem? How will the solution solve the problem? Will it solve the problem in its entirety or partially? What portion of the problem will it solve, if not the whole problem?*

#### *Practice review*

<sup>9</sup> [Increase in awareness of whistleblowing legislation – latest survey | Ombudsman New Zealand](#)

<p>The Public Service Commission will undertake and publish a review of public sector agency practice in applying the Protected Disclosures (Protection of Whistleblowers) Act 2022.</p> <p><i>Transparency on responses to retaliation</i></p> <p>The Public Service Commission will research and publish information on the consequences for organisations that unlawfully retaliate against whistleblowers.</p> <p><i>Investigating a community of practice</i></p> <p>The Public Service Commission will scope the practicality of, and interest in, a protected disclosures community of practice, similar to the <a href="#">OIA Forum</a>.</p>
<p><b>3. What results do we want to achieve by implementing this commitment?</b></p> <p><i>What outputs would we like to produce? What changes in knowledge, skills, and capacities do we want to achieve? What changes in behaviour, systems, and practices do we want to create?</i></p> <p>We want to achieve:</p> <ul style="list-style-type: none"> <li>• Better awareness of the consequences for unlawful retaliation against whistleblowers and deterrence of this behaviour.</li> <li>• Improved confidence that disclosures will be protected.</li> <li>• Increased consistency in protected disclosure handling.</li> <li>• Public confidence that there is a system to protect whistleblowing, and detect and respond to corruption or other forms of serious wrongdoing.</li> </ul>

Commitment Analysis	
Questions	Answer (if not applicable, just answer with N/A)
<p>1. How will the commitment promote transparency?</p> <p><i>How will it help improve citizens' access to information and data? How will it make the government more transparent to citizens?</i></p>	<p>A practice review would provide greater visibility into how effectively agencies are complying with the Act.</p>
<p>2. How will the commitment help foster accountability?</p> <p><i>How will it help public agencies become more accountable to the public? How will it facilitate citizens' ability to learn how the implementation is progressing? How will it support transparent monitoring and evaluation systems?</i></p>	<p>Greater transparency on compliance with the Act's requirements will enhance accountability.</p>
<p>3. How will the commitment improve citizen participation in defining, implementing, and monitoring solutions?</p> <p><i>How will it proactively engage citizens and citizen groups?</i></p>	<p>Publishing the practice review will enable citizens to monitor how agencies are implementing the Act's requirements.</p>

### Treaty of Waitangi analysis (added for NZ commitments)

#### What Treaty of Waitangi considerations are relevant to this commitment?

Guidance here [Treaty of Waitangi analysis | Department of the Prime Minister and Cabinet \(DPMC\)](#)

This commitment does not affect Māori differently to other New Zealanders, nor does it involve any legal obligations by the Crown in a Treaty context.

While working on the 2022 amendment bill, the Public Service Commission heard that protecting vulnerable people who are raising allegations of serious wrongdoing is consistent with tikanga.

A community of practice on protected disclosures may assist appropriate authorities to build maturity in handling disclosures in a culturally appropriate way, where required.

### Co-creation analysis (added for NZ commitments)

#### How did the co-creation process inform development of this commitment?

A practice review of the Act was signalled on the PSC's Integrity Action Plan prior to the workshops, but did not have a detailed work programme attached to it. Points raised at the workshops will help to inform the focus of the review.

A community of practice, and suggestion to publish the consequences for retaliation, are both new ideas that were shared during the workshops.

Stakeholders suggested an advisory group could support the practice review, but given the nature of confidential cases that would need to be discussed in the course of the practice review the Commission did not consider this feasible. Stakeholders also identified non-government stakeholders whose expertise could help inform the review, which were incorporated into this commitment.



<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
<i>(Milestones are part of a series of actions or events that, when executed, will lead to the achievement of the result the commitment would like to achieve.)</i>	<i>(Outputs are concrete, objectively verifiable results that are direct products of activities conducted or implemented.)</i>		
<p>Refine and scope the project:</p> <ul style="list-style-type: none"> <li>• identify a project lead and key contact point for the work within PSC</li> <li>• develop a high-level project plan and draft methodology for the review,</li> <li>• identify key stakeholders to engage with.</li> </ul>	Project plan and associated documents (PSC)	June 2026	<p><b>Lead:</b> Public Service Commission</p> <p><b>Supporting Stakeholders:</b></p> <ul style="list-style-type: none"> <li>• <b>Government:</b> Other agencies that frequently receive protected disclosures, including the Office of the Ombudsman.</li> <li>• <b>CSOs:</b> Potential CSOs include TINZ, Community Law Centres, NZCCL.</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> Academics undertaking research on disclosure (at Victoria University of Wellington and elsewhere); Other jurisdictions (including Australia, UK); Potentially, large private sector entities who receive protected disclosures (for example banks or utility providers).</li> </ul>

<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
Research and publish information on the Commission website outlining consequences for agencies that unlawfully retaliate against whistle blowers.	Information published on PSC website.	June 2026	As above
Undertake desk research on the protected disclosures regime, looking at past reviews, reports and commentary. This could include research on how well the regime works for different groups, including Māori and disability communities.		December 2026	As above
Engage with agencies and other stakeholders to better understand the current state of protected disclosure management in practice, including strengths, challenges and risks emerging from specific cases. This could include reasons people do not feel safe making disclosures currently.		April 2027	As above
Scope practicality of, and interest in, a public sector protected disclosures community of practice.	Expressions of interest in community of practice recorded (as part of engagement)	April 2027	As above

<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
<i>If practical</i> , establish the public sector protected disclosures community of practice, including: <ul style="list-style-type: none"> <li>• Terms of Reference including governance arrangements</li> <li>• Forward agenda</li> </ul>	Community of practice established with a Terms of Reference and forward agenda.	June 2027	As above
Publish a draft practice review document for public comment based on research and engagement feedback.	Draft Practice Review report published.  <i>To include summary of engagement noting key themes discussed</i>	August 2027	As above
Incorporate feedback and finalise practice review document, publish on PSC website.	Final Practice Review report published	September 2027	As above
Consider “stretch” activities for further improving practice and understanding of protected disclosures, e.g. publishing data on the number and themes of protected disclosures.	<i>TBC, dependent on Final Practice Review</i>	December 2027	As above

## Develop a Corruption Risk Assessment Tool

<b>Country</b>	New Zealand
<b>Number and Name of the Commitment</b>	<b>2. Develop a Corruption Risk Assessment Tool</b>
<b>Brief Description of the Commitment</b>	Design a Corruption Risk Assessment Tool for public sector agencies to identify corruption and insider threat risks within their organisation. The tool will assist agencies to take steps to mitigate these risks.
<b>Commitment Lead</b>	Serious Fraud Office
<b>Supporting Stakeholders</b>	<ul style="list-style-type: none"> <li>• <b>Government:</b> Anti-Corruption Taskforce Pilot partners and agencies, NZ Police, SFO Counter-Fraud Community of Practice, public sector agencies that may be users of the Tool.</li> <li>• <b>CSOs:</b> Potentially includes Transparency International New Zealand, CSOs that may be potential users of the Tool. Helen Clark Foundation.</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> Private sector and other entities engaging with the SFO Counter Fraud Centre. The Law Society and Chartered Accountants Australia and New Zealand represent professionals who are likely to be involved in assessing risks of corruption. Other internal auditors and risk professionals.</li> </ul>
<b>Period Covered</b>	2026-2027

### Problem Definition

#### 1. What problem does the commitment aim to address?

*Who is affected? Where is it taking place? How are they affected? When are they most affected? When did the problem start? How long has the problem impacted those affected?*

Global estimates suggest approximately 0.45% - 5.6% of public funds are lost to fraud, error and corruption each year. In New Zealand, this would equate to around \$601 million - \$7.48 billion, or \$12.97 billion when tax revenues are included.

Harm from corruption isn't limited to dollar values. It damages the integrity of the public sector resulting in declining public trust in government institutions. The resulting reputational damage to New Zealand can also impact investor confidence, meaning long term economic harm than can be difficult to quantify but extends far beyond the public sector. This can have serious consequences, including eroding the integrity of New Zealand's institutions and social licence of agencies, degradation of capability, economic damage, and compromised national security.

The true scale of the issue is unknown. Public sector agencies in New Zealand are not currently required to report on fraud and corruption that may be occurring, or what controls they have in place to prevent it. This lack of insight means agencies are unable to meaningfully intervene at a system level, understand where to focus detection and prevention activities or assess their effectiveness. It also leaves New Zealand on the back foot when it comes to leveraging the power of data analytics to identify indicators of fraud and corruption.

The Serious Fraud Office explored corruption and fraud in the context of detection for its 2025 Long-term Insights Briefing, concluding that the harm caused by individual acts of bribery or corruption can have wide-reaching impacts. A corruptly awarded infrastructure, building or roading contract can have wide scale health and safety implications to whole communities, if it means a contract is awarded to a sub-qualified party. More broadly, corruption is corrosive to trust and confidence in public institutions. Even very low levels of bribery can drastically impact public corruption perceptions.

Much as organisations are alert to risk across all parts of the business, including health and safety, financial and environmental risks, they should also be alert to the risk of insider threat. A general lack of awareness can heighten the risk of insider threat. It can help if employees are able to identify and report red flags in others' behaviours.

## **2. What are the causes of the problem?**

*Elaborate on your understanding of the causes of the problem. As much as possible, identify the root causes. Utilize problem analytical tools (e.g., problem tree, five whys, fishbone diagram, or other related methods) when necessary and provide evidence whenever possible.*

Dr Simon Chapple prepared a report for Transparency International New Zealand assessing the effectiveness of anti-corruption institutions in New Zealand in deterring, detecting and exposing corruption.

It found that observed decline in New Zealand's Corruption Perceptions Index score represented a real underlying rise in corruption - reflecting previously identified issues including political lobbying and transparency in political donations, political neutrality in public sector officials, changes in New Zealand's trade patterns, increasing immigration from high corruption countries, growing political polarisation, a weakening of the general multi-lateral cooperative world, and a growing willingness of some foreign states to 'weaponise' trade and local immigrant populations.

Some of these findings were also reflected in a report published by the Helen Clark Foundation "Shining a Light: Improving Transparency in New Zealand's political and governance systems" which noted that issues such as political party funding and lobbying risked eroding trust and confidence in public institutions.

In New Zealand the most common insider threat risks are fraud, theft of intellectual property, and corruption. A breach of trust within an organisation may also take the form of information leaks, privacy breaches or sabotaged systems. As agencies generally have low maturity in understanding of these risks, mitigations are often ad hoc and reactive, rather than proactive and focussed on prevention.

## **Commitment Description**

### **1. What results do we want to achieve by implementing this commitment?**

*What outputs would we like to produce? What changes in knowledge, skills, and capacities do we want to achieve? What changes in behaviour, systems, and practices do we want to create?*

In 2023, the Serious Fraud Office published guidance on Insider Threats. This guidance helped to raise awareness about insider threats at a high level, specific to the public sector. The guidance has been supported by Community of Practice meetings with the SFO's Counter Fraud Centre, to discuss the guidance in more depth and provide practical lessons for agencies to help them start



to recognise where their risks might lie, and what might cause insider threats to emerge. However, the guidance is not a required standard, so agency awareness of the existence of the guidance is limited, and uptake is voluntary.

The SFO led Anti-Corruption Taskforce Pilot was launched in July 2025 with the aim of testing a way to build a clearer, system-wide picture of corruption and fraud risks across the New Zealand public service. It sought to highlight gaps, inform targeted responses and assess emerging threats and will report back in December 2025.

The New Zealand Security Intelligence Service (NZSIS) has a role in detecting and helping to prevent insider threats. The NZSIS's Security Threat Environment 2025 report includes information and case studies about insider threats, and protective security advice for mitigating insider threat risks.

## 2. What solution are you proposing?

*What will you do to solve the problem? How does this differ from previous efforts? In what way will the solution solve the problem? How will the solution solve the problem? Will it solve the problem in its entirety or partially? What portion of the problem will it solve, if not the whole problem?*

The Serious Fraud Office will design and make available a Corruption Risk Assessment Tool ('the Tool') that will enable public sector agencies to identify corruption and insider threat risks within their organisation. The tool will support agencies, and potentially other entities, to accurately identify and assess insider threat risks presented by the nature and function of their organisations, and provide guidance and education to support the mitigation of those risks.

## 3. What results do we want to achieve by implementing this commitment?

*What outputs would we like to produce? What changes in knowledge, skills, and capacities do we want to achieve? What changes in behaviour, systems, and practices do we want to create?*

We want to achieve:

- Better capability within agencies to detect and act on corruption risks specific to their environment. This will enable agencies to enact targeted interventions, support improved training and education for potentially at-risk staff or positions.
- Greater public confidence that the public sector is live to the risks it might encounter and has a plan to prevent them before they occur.
- Hardened defences for the public sector against those that might seek to corrupt it, from within or without.

Commitment Analysis	
Questions	Answer (if not applicable, answer with N/A)
<p>1. How will the commitment promote transparency?</p> <p><i>How will it help improve citizens' access to information and data? How will it make the government more transparent to citizens?</i></p>	<p>Developing and making this tool available would provide a level of assurance to the public of the types of risks the public sector is identifying and addressing.</p>
<p>2. How will the commitment help foster accountability?</p>	<p>Developing and making this tool available would provide a level of assurance to the</p>

<i>How will it help public agencies become more accountable to the public? How will it facilitate citizens' ability to learn how the implementation is progressing? How will it support transparent monitoring and evaluation systems?</i>	public that the public sector is live to the risks it might encounter, and has a plan to prevent them before they occur.
<p>3. How will the commitment improve citizen participation in defining, implementing, and monitoring solutions?</p> <p><i>How will it proactively engage citizens and citizen groups?</i></p>	Important research in civil society will inform work to identify the risks and red flags for potentially corrupt conduct.

### Treaty of Waitangi analysis (added for NZ commitments)

#### What Treaty of Waitangi considerations are relevant to this commitment?

Guidance here [Treaty of Waitangi analysis | Department of the Prime Minister and Cabinet \(DPMC\)](#)

This commitment supports the principle of protection by enabling agencies to detect and prevent corruption. It will help to protect the rights guaranteed in the Treaty of Waitangi, and support fair and transparent decision-making in areas affecting Māori communities, resources, and governance.

### Co-creation analysis (added for NZ commitments)

#### How did the co-creation process inform development of this commitment?

Discussion at the workshops highlighted that New Zealand's response to the threat of corruption needs to be risk-based, and tailored to the circumstances through which corruption may happen. This commitment responds to that discussion by improving the ability of agencies to assess corruption risk within their organisations.

As a result of discussions at the final workshop, the focus of the Tool was refined towards risk, and potential review and report-back points were incorporated into milestones.

<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
<i>(Milestones are part of a series of actions or events that, when executed, will lead to the achievement of the result the commitment would like to achieve.)</i>	<i>(Outputs are concrete, objectively-verifiable results that are direct products of activities conducted or implemented.)</i>		
Evaluate effectiveness of the Anti-Corruption Taskforce Pilot assessment tool and lessons learned for developing the Tool.	Insights around effectively and efficiently identifying and recording corruption risks	February 2026	<b>Lead:</b> SFO, with support of PSC and NZ Police
Refine and scope the project: <ul style="list-style-type: none"> <li>• identify a project lead/key contact point for the work within SFO</li> <li>• develop a high-level project plan and scope for the Tool,</li> <li>• identify key agency and civil society stakeholders to engage with.</li> <li>• research other tools available globally.</li> </ul>		February 2026	<b>Lead:</b> SFO <b>Supporting Stakeholders:</b> <ul style="list-style-type: none"> <li>• <b>Government:</b> Anti-Corruption Taskforce Pilot partners and agencies, NZ Police, SFO Counter-Fraud Community of Practice, public sector agencies that may be users of the Tool</li> <li>• <b>CSOs:</b> Potentially includes TINZ.</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> Private sector and other entities engaging with the SFO Counter Fraud Centre</li> </ul>
SFO consult with civil society and agency stakeholders on first draft of Corruption Risk Assessment Tool		August 2026	As above

<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
Seek feedback from agencies who have tested the working version of the Tool, and make improvements to the Tool	Refined version of Tool	November 2026	As above
Publish Corruption Risk Assessment Tool for use by public sector agencies and any non-government entities that may wish to adopt it	Tool published on SFO website // available via SFO Counter Fraud Centre	June 2027	As above
SFO share insights from roll-out of the Tool	Blog post or similar communication, e.g. via SFO website	By December 2027	As above

## Support ethical government – private sector career transitions

<b>Country</b>	New Zealand
<b>Number and Name of the Commitment</b>	<b>3. Support ethical government – private sector career transitions</b>
<b>Brief Description of the Commitment</b>	Produce a discussion document exploring the movement of individuals (elected and non-elected) between government and private sector roles, including lobbying, and identify potential options to support ethical transitions.
<b>Commitment Lead</b>	Te Kawa Mataaho Public Service Commission Ministry of Justice
<b>Supporting Stakeholders</b>	<ul style="list-style-type: none"> <li>• <b>Government:</b> All public sector agencies, the Office of the Auditor General.</li> <li>• <b>CSOs:</b> Potential CSOs include TINZ, Health Coalition Aotearoa, the Helen Clark Foundation, the Public Service Association and interested academics</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> Iwi entities and private sector businesses may have an interest in this commitment, as staff transition to and from working for these groups.</li> </ul>
<b>Period Covered</b>	2026-2027

### Problem Definition

#### 1. What problem does the commitment aim to address?

*Who is affected? Where is it taking place? How are they affected? When are they most affected? When did the problem start? How long has the problem impacted those affected?*

Individuals (elected and non-elected) transitioning between roles in government and the private sector (informally known as the ‘revolving door’) generates a useful exchange of skills and perspectives. When well managed these transitions can enrich both sectors. New Zealand has comparatively few restrictions or regulations on individuals transitioning between government and private sector employment (in either direction), and the expectations on those making this move are not always clear. This creates two issues:

#### *Disincentive on career transitions*

A lack of safeguards may discourage individuals from moving between the public and private sectors if they cannot do so without taking on professional risk. Government benefits from learning from the private sector and from having individuals with government experience working in industry. To enable this exchange, it is important that people feel confident taking on public office or public sector roles, knowing they can safely transition to a career with the private sector.

#### *Public trust risk*

Poorly managed government-private sector transitions that are not ethically managed can undermine public trust in government. Risks can arise through real or perceived conflicts of



interest when individuals move into roles with insider knowledge or where they may use their connections to benefit their clients, or themselves, at the expense of the broader public interest. There is limited understanding of how widespread these issues are, or what policy options might offer a proportionate and effective response to the potential risks. This commitment aims to address this lack of evidence and gather public input on potential options to mitigate risks and promote ethical career transitions between government and the private sector.

## 2. What are the causes of the problem?

*Elaborate on your understanding of the causes of the problem. As much as possible, identify the root causes. Utilize problem analytical tools (e.g., problem tree, five whys, fishbone diagram, or other related methods) when necessary and provide evidence whenever possible.*

A lack of clear expectations around career transitions causes the issues cited above. Low public confidence that these transitions are ethically managed has led to concern that New Zealand has insufficient safeguards to prevent the risks of the ‘revolving door’ phenomenon: potential misuse of privileged information and access to decision-makers that lacks transparency.

Independent research has highlighted the following factors which contribute to public trust risks with government – private sector career transitions:

- Potential growth in the local lobbying industry, though the lack of regulation around lobbying in New Zealand makes this difficult to quantify.<sup>10</sup>
- The concentration of executive decision-making power in New Zealand’s system.<sup>11</sup>
- Complacency around emerging issues (such as income inequality) and an informal approach to political integrity and access.<sup>12</sup>

## Commitment Description

### 1. What has been done so far to solve the problem?

*What solutions were made available for this problem in previous years? How successful have they been?*

There are some controls in place to address the two primary risks of government – private sector career transitions (potential privileged information and access to decision-makers that lacks transparency):

*Misuse (or potential misuse) of privileged information*

- The Public Service Code of Conduct requires information to be used only for proper purposes
  - However, the Code applies only to current public servants, not former MPs, Ministers, or ex-public servants.
- The Cabinet Manual restricts former Ministers from disclosing official information not already in the public domain.

<sup>10</sup> Thomas Anderson and Simon Chapple, *Grease or Sand in the Wheels of Democracy? The market for lobbying in New Zealand*, Policy Quarterly, 14 (2), 2018, p 13.

<sup>11</sup> Max Rashbrooke, *A Balance of Voices: Options for the Regulation of Lobbying in New Zealand*, Health Coalition Aotearoa, 2024, p 23.

<sup>12</sup> Philippa Yasbek, *Shining a Light: Improving Transparency in New Zealand’s Political and Governance Systems*, Helen Clark Foundation, 2024, p 22.

- Legal provisions (e.g., Crimes Act s78A, Summary Offences Act s20A) prevent unauthorised disclosure of official information but apply only in cases involving national security, public order, or economic stability.

#### *Access to decision-makers*

- A 2023 Ministry of Justice consultation identified the ‘revolving door’ between political and lobbying roles as a source of public distrust.
- The Cabinet Manual states that Ministers’ decisions should not be influenced by prospects of future employment.
- Current public servants may need to declare conflicts of interest from personal relationships with former colleagues now working in the private sector.

However, these controls have not resulted in any noticeable changes to public trust on this issue, or to the numbers of individuals moving between public and private sector role (noting that data on this movement is limited).

## **2. What solution are you proposing?**

*What will you do to solve the problem? How does this differ from previous efforts? In what way will the solution solve the problem? How will the solution solve the problem? Will it solve the problem in its entirety or partially? What portion of the problem will it solve, if not the whole problem?*

The Ministry of Justice and the Public Service Commission will jointly develop and publish a discussion document that explores the risks of, and disincentives to, government - private sector transitions, including risks to public trust. It will seek public input on these issues and propose potential policy options to clarify expectations and tools to support these transitions while maintaining public trust.

Aspects of this build on the [Ministry of Justice’s previous political lobbying work](#), but the proposed work expands the scope beyond just elected officials to include senior public servants, and looks to progress work on a specific aspect of lobbying regulation.

## **3. What results do we want to achieve by implementing this commitment?**

*What outputs would we like to produce? What changes in knowledge, skills, and capacities do we want to achieve? What changes in behavior, systems, and practices do we want to create?*

We want to achieve:

- Improved public understanding of factors influencing government decision making in New Zealand.
- Clearer understanding of options to reduce risks of unethical transitions.
- Greater public confidence that risks arising from transitions between the public and private sector can be managed.

Commitment Analysis	
Questions	Answer (if not applicable, answer with N/A)
<p>1. How will the commitment promote transparency?</p> <p><i>How will it help improve citizens' access to information and data? How will it make the government more transparent to citizens?</i></p>	<p>The discussion document will increase transparency by clarifying current arrangements for government – private sector career transitions, identifying the scale of risk, and exploring options to support ethical transitions.</p>
<p>2. How will the commitment help foster accountability?</p> <p><i>How will it help public agencies become more accountable to the public? How will it facilitate citizens' ability to learn how the implementation is progressing? How will it support transparent monitoring and evaluation systems?</i></p>	<p>The commitment will foster accountability by increasing visibility into the 'revolving door' phenomenon and any resulting influence on government decision-making. By publishing a discussion document that outlines current arrangements and explores options for reform, it enables greater responsiveness to public concerns.</p>
<p>3. How will the commitment improve citizen participation in defining, implementing, and monitoring solutions?</p> <p><i>How will it proactively engage citizens and citizen groups?</i></p>	<p>The discussion document will support citizen participation by engaging relevant groups and experts in exploring the issue, and proposing options to mitigate risks and improve transparency.</p>

Treaty of Waitangi analysis (added for NZ commitments)
<p><b>What Treaty of Waitangi considerations are relevant to this commitment?</b></p> <p><i>Guidance here <a href="#">Treaty of Waitangi analysis   Department of the Prime Minister and Cabinet (DPMC)</a></i></p> <p>In its targeted consultation of a voluntary code for lobbyists in 2023, the Ministry of Justice heard that the rights of rūnanga to engage as Te Tiriti partners must not be conflated with lobbying. The Ministry also heard that te ao Māori could guide good practice expectations for lobbying. Kawa and tikanga already underpin an ethical approach to lobbying - for example, statements made on the marae are heard by everyone.</p> <p>Research commissioned by Health Coalition Aotearoa highlights that options to regulate lobbying and/or the revolving door phenomenon should not unreasonably limit opportunities available to Māori working in and around government. It cites a potential that regulation could “create a significant burden for Māori who do work for government and then progress other work and/or advocate for their Iwi in their ‘downtime’.”<sup>13</sup></p>

<sup>13</sup> Mather Solutions Limited, *Māori Perspectives on Options for Lobbying Regulations*, Health Coalition Aotearoa, 2024, p14.

### Co-creation analysis (added for NZ commitments)

#### How did the co-creation process inform development of this commitment?

This topic was raised in both workshops across different groups. While improving transparency around the ‘revolving door’ for senior public servants was already identified as a potential commitment in the Public Service Commission’s Integrity Action Plan, participants suggested that a stronger approach would be to broaden the scope beyond just the public service and ensure it covered movement in both directions (i.e. individuals leaving government to join the private sector, and vice versa).

In discussion about potential milestones and outputs, stakeholders asked for more attention to be given to researching international solutions, to consider options to broaden the scope for options to agencies beyond the Public Service Commissioner’s integrity mandate, and recommended a staged approach to releasing information and desk research to allow deeper stakeholder engagement over the life of the commitment. In response, the Public Service Commission and the Ministry of Justice worked together to expand the scope of the commitment.

<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
<i>(Milestones are part of a series of actions or events that, when executed, will lead to the achievement of the result the commitment would like to achieve.)</i>	<i>(Outputs are concrete, objectively-verifiable results that are direct products of activities conducted or implemented.)</i>		
Refine and scope the project: <ul style="list-style-type: none"> <li>• identify a project lead and key contact point for the work within PSC/MoJ</li> <li>• identify key agency and civil society stakeholders to engage with (PSC).</li> </ul>	Project plan and associated documents	May 2026	<b>Lead:</b> PSC and MoJ <b>Supporting/Interested Stakeholders:</b> <ul style="list-style-type: none"> <li>• <b>Government:</b> All public sector agencies.</li> <li>• <b>CSOs:</b> Potential CSOs include: TINZ, Health Coalition Aotearoa, the Helen Clark Foundation, PSA and interested academics</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> Iwi entities and private sector businesses may have an interest in this commitment, as staff transition to work for these groups.</li> </ul>
Establish a reference group (by invitation) to support development of the discussion document with reference to public service leaders' transitions.	Reference group members and terms of reference agreed.	May 2026	As above. Reference group led by PSC, to include non-government participants.
Background research, including drawing on international approaches		June 2026	As above.



<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
Draft discussion document	Draft discussion document for engagement published	June 2026	As above.
Public consultation	Summary of engagement noting key themes published	August 2026	As above.
Dissolve reference group		September 2026	PSC

## Explore options to improve transparency of senior leaders' conflicts of interest

<b>Country</b>	New Zealand
<b>Number and Name of the Commitment</b>	<b>4. Explore options to improve transparency of senior leaders' conflicts of interest</b>
<b>Brief Description of the Commitment</b>	Research and scope options to improve transparency of conflicts of interest held by senior leaders in the public sector.
<b>Commitment Lead</b>	Te Kawa Mataaho Public Service Commission
<b>Supporting Stakeholders</b>	<ul style="list-style-type: none"> <li>• <b>Government:</b> Senior leaders including agency CEs and Board chairs.</li> <li>• <b>CSOs:</b> Potential CSOs include TINZ</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> Potential others include the Institute of Directors, potential other jurisdictions include Australia, the UK and Canada.</li> </ul>
<b>Period Covered</b>	2026-2027

### Problem Definition

#### 1. What problem does the commitment aim to address?

*Who is affected? Where is it taking place? How are they affected? When are they most affected? When did the problem start? How long has the problem impacted those affected?*

The public service must identify and manage conflicts of interest well. This is required to uphold confidence in public sector decision-making and impartiality. Poorly managed conflicts of interest can undermine public trust and damage the integrity of public decision-making.

Managing conflicts of interest is particularly important for senior public service leaders, like chief executives or board chairs and members, who often make significant decisions about public spending and setting agency direction.

Currently, under the Public Service Commissioner's model standard on conflicts of interest, chief executives of agencies must declare any conflict of interest to the Public Service Commission and crown entity board members must disclose any interests in accordance with the Crown Entities Act 2004. However, there is no publication of declared interests or management plans. This limits the transparency of how senior leaders' conflicts of interest are managed and prevents any public scrutiny of these interests.

The lack of centralised data about senior public servant's interests was noted as an area for improvement at OGP workshops.

## 2. What are the causes of the problem?

*Elaborate on your understanding of the causes of the problem. As much as possible, identify the root causes. Utilize problem analytical tools (e.g., problem tree, five whys, fishbone diagram, or other related methods) when necessary and provide evidence whenever possible.*

There is no requirement in legislation or Public Service Commission guidance that senior public servants' interests must be published. Although this could happen without any requirement in legislation or guidance, it has not occurred to date. This contrasts with government Ministers, whose interests are published by DPMC, in line with Cabinet Manual requirements.

### Commitment Description

#### 1. What has been done so far to solve the problem?

*What solutions were made available for this problem in previous years? How successful have they been?*

In the past year PSC has strengthened conflict of interest management practices by:

- Strengthening and reissuing the conflict of interest model standards.
- Publishing the one-page guide to conflict of interest conversations.
- Developing a set of examples of conflict of interest management plans, to support public servants and their managers to create effective management plans.

These tools support better management of conflicts of interest across the public service for all employees, but have not focused on the interests of senior leaders.

This year PSC also issued the *Action Plan to strengthen integrity 2025 – 2028*. A stretch goal in the action plan is to “Explore options to increase transparency of chief executive and board chair interests & management plans – 2026/2027 start”. Work has not commenced on this potential stretch goal.

#### 2. What solution are you proposing?

*What will you do to solve the problem? How does this differ from previous efforts? In what way will the solution solve the problem? How will the solution solve the problem? Will it solve the problem in its entirety or partially? What portion of the problem will it solve, if not the whole problem?*

PSC will undertake work to better understand the problem, scope possible solutions (including privacy implications) and consult stakeholders. The work will be supported by a reference group that includes agency and civil society representatives. Solutions might include the development of a public register of senior leader's declared interests and/or management plans, or an independent review process, or other ideas that emerge during research.

#### 3. What results do we want to achieve by implementing this commitment?

*What outputs would we like to produce? What changes in knowledge, skills, and capacities do we want to achieve? What changes in behavior, systems, and practices do we want to create?*

We want to achieve:

- Improved transparency of information about senior public servants' conflicts of interest.
- Greater public access to information about senior public servants' conflicts of interest to give greater confidence that interests are declared and managed well.

Commitment Analysis	
Questions	Answer (if not applicable, answer with N/A)
<p>1. How will the commitment promote transparency?</p> <p><i>How will it help improve citizens' access to information and data? How will it make the government more transparent to citizens?</i></p>	Depending on the options scoped, it could provide the public with greater access to information about how senior public servants' interests are managed. This will need to include a privacy assessment.
<p>2. How will the commitment help foster accountability?</p> <p><i>How will it help public agencies become more accountable to the public? How will it facilitate citizens' ability to learn how the implementation is progressing? How will it support transparent monitoring and evaluation systems?</i></p>	Publishing senior public servants' interests and management plans supports accountability by better enabling public and Parliamentary scrutiny. It also demonstrates a proactive approach to risk management by showing how a conflict of interest is being managed.
<p>3. How will the commitment improve citizen participation in defining, implementing, and monitoring solutions?</p> <p><i>How will it proactively engage citizens and citizen groups?</i></p>	The perspectives of stakeholders, including relevant civil society organisations, will be part of the policy development process.

Treaty of Waitangi analysis (added for NZ commitments)
What Treaty of Waitangi considerations are relevant to this commitment?
<p>Guidance here <a href="#">Treaty of Waitangi analysis   Department of the Prime Minister and Cabinet (DPMC)</a></p> <p>Increased transparency of senior public servants' conflicts of interest supports the principle of participation by allowing Māori to better understand and scrutinise these conflicts.</p>

Co-creation analysis (added for NZ commitments)
How did the co-creation process inform development of this commitment?
<p>At workshops several stakeholders raised conflicts of interest as an area for a potential commitment, which informed the development of the commitment. Key issues included:</p> <ul style="list-style-type: none"> <li>• There is a lack of leadership culture promoting integrity.</li> <li>• That no centralised conflict of interest data is available for senior public servants (leading to suggestions for a commitment to create a centralised register for senior public servants).</li> <li>• When discussing the potential for a centralised register, stakeholders highlighted the importance of considering different contexts of chief executives (as employees) and board chairs, and suggestions for making published information more accessible and useful.</li> <li>• That registers need to capture the conflicts and the management plan to be effective.</li> </ul>

<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
<i>(Milestones are part of a series of actions or events that, when executed, will lead to the achievement of the result the commitment would like to achieve.)</i>	<i>(Outputs are concrete, objectively-verifiable results that are direct products of activities conducted or implemented.)</i>		
Refine and scope the project: <ul style="list-style-type: none"> <li>• identify a project lead and key contact point for the work within PSC,</li> <li>• develop a high-level project plan,</li> <li>• identify key agency and civil society stakeholders to engage with, and</li> <li>• draft Terms of Reference for a reference group (by invitation).</li> </ul>	Project plan and associated documents (PSC)  Terms of Reference for reference group to explore options.	June 2026	<b>Lead:</b> PSC <b>Supporting stakeholders:</b> <ul style="list-style-type: none"> <li>• <b>Government:</b> Senior leaders including agency CEs and Board chairs.</li> <li>• <b>CSOs:</b> Potential CSOs include TINZ</li> <li>• <b>Others (e.g., Parliament, Private Sector etc):</b> Potentially, the Institute of Directors: Other jurisdictions, notably Australia, the UK and Canada.</li> </ul>
Establish reference group (by invitation)	Reference group members and Terms of Reference agreed.	June 2026	As above. PSC to establish reference group by invitation.

<b>Commitment Planning</b> <i>(This is an initial planning process largely looking at milestones and expected outputs, as well as key stakeholders involved.)</i>			
<b>Milestones</b>	<b>Expected Outputs</b>	<b>Expected Completion Date</b>	<b>Stakeholders</b> Stakeholders listed below may contribute to one or more milestones during delivery.
Desk research and interviews on conflict of interest transparency practices for senior public servants and Board chairs, drawing on international comparisons, which could include Australia, the UK, Canada, Scandinavian nations and Singapore. Consider existing guidance including OCED and World Bank guidance.	Summary of research.	September 2026	As above
Working with reference group, develop an options discussion document for wider engagement.	Discussion document published	September 2026	As above
Engage with stakeholders, including CSOs and senior leaders, on options to enhance transparency of senior leaders' interests.	Summary of engagement.	December 2026	As above
Advice to the Minister for the Public Service on options to improve transparency		June 2027	As above

## Implementing the plan

The implementation of commitments will occur over 2026 – 2027. Lead agencies will engage with key civil society stakeholders (which may include groups who have not been involved in the OGP process) as part of this. While the commitment templates show high-level milestones, many commitments will involve additional tasks and activities that sit below these.

Each year NAP5 is active there will be at least two public OGP meetings with civil society and the public invited to discuss the implementation of commitments. In addition, some commitments have reference groups and/or targeted public engagement opportunities within their milestones.

These provide an opportunity for agencies to present on what they have achieved and answer questions about progress to date. The Commission will also provide ongoing updates on OGP through the Commission website and social media channels.

New Zealand is expected to have a General Election in the second half of 2026. This may impact the delivery of commitment milestones. The OGP process allows commitments to be extended or added to an existing action plan during the implementation period.

The IRM also has a role tracking progress on commitments. Firstly, the IRM will publish an Action Plan Review, providing an independent overview of the strengths and challenges of the plan. The Action Plan Review for NAP5 will be published in early 2026 on the [OGP website](#). Secondly, close to the end of the implementation period (late 2027), the IRM will publish a Results Report, offering an assessment of the implementation of the plan and compliance with OGP criteria.

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