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Te Kawa Mataaho
Public Service Commission

The Future of Public Service Integrity

Te Anamata o te Tapatahi o te Ratonga Tūmatanui

Long-Term Insights Briefing 2025

Acknowledgements

We are extremely grateful to everyone who gave up their time to provide comments on the scope and content of their briefing across all stages of its development, including through workshops and written responses. More detail on our various engagement processes and the feedback we received is provided in Appendix 1.

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Ihirangi | Contents

Whakarāpopotonga Matua | Executive Summary

Integrity is at the heart of what the public service does and what it means to be a public servant. It is central to building and maintaining trust in government, and supports the legitimacy and functioning of our democracy. New Zealanders expect integrity from their public service, and it also delivers significant economic benefits by protecting against corruption. Integrity ensures that when the power of the state and public resources are used, the public interest is protected. That is why we cannot risk losing it and why it is a critical part of the work we do at the Public Service Commission.

This briefing aims to help the public and decision-makers think about the future of public service integrity in New Zealand.

Public service integrity in this context means individual public servants or public service agencies are acting in line with professional standards that uphold the public interest over individual or private interests. These standards are over and above basic expectations of compliance with the law.

They include the shared values, principles and purpose set out in the Public Service Act 2020 and minimum standards of conduct for public servants set by the Public Service Commissioner. Following these ethics (external standards) guides us to act with integrity. Acting with integrity protects against specific risks like corruption but covers a much wider range of positive behaviours than just the absence of corruption.

New Zealand takes integrity seriously and we have developed a strong foundation that has served us well domestically and on the international stage, even though our approach may look different from other countries. New Zealand's public service is known for its high integrity. But we chose this as the topic of our briefing because we believe that our strong foundation is increasingly vulnerable to new risks. It has been hard to achieve the foundation we have, and it will only get harder to maintain it as it is challenged. We will need to be proactive in identifying and responding to emerging challenges.

Internationally, a range of countries with strong historic reputations for public trust and similar governance arrangements have recently experienced significant integrity failures. Our integrity context is going to continue to evolve because it is influenced by a dynamic and complex environment. Challenges to public service integrity will only be intensified by trends such as the rise of transnational organised crime, fiscal pressures and increasing crisis responses, and polarisation.

In this briefing we examine the current state of New Zealand's public service integrity, and look at key trends that will influence our integrity environment over the next 10 to 15 years, drawing on research and information we have heard from integrity agencies, stakeholders and the public. We are committed to finding ways to build on the work we have already done to get the best possible public service integrity system, ready to meet the challenges we are already facing and those we may face in the future.

Current integrity approach and performance

New Zealand upholds public service integrity both by promoting positive ethical behaviour through public service values and culture, and by enforcing rules through detection, investigation and consequences for unethical behaviour. The Code of Conduct, standards, and laws are all important mechanisms for this.

In this briefing we use the three pillars (system, culture and accountability) of the 2017 OECD *Recommendation of the Council on Public Integrity* to contextualise New Zealand's current activities to uphold public service integrity.

The OECD Recommendation is an internationally recognised framework for describing and assessing integrity systems. It covers how countries can uphold the integrity of public institutions by:

- establishing integrity responsibilities and strategies,
- setting standards and creating a positive environment for integrity, and
- identifying and responding to integrity breaches.

New Zealand has a multi-agency approach to public service integrity, in which the Public Service Commissioner has system-level responsibility for promoting integrity, accountability, and transparency across much of the public sector.[i]

[i] The Commissioner's integrity mandate is strongest in the core public service, with coverage lessening slightly as it extends into the state services, wider state sector, and then into the public sector. For example, the mandate does not extend to local government.

Key oversight and enforcement bodies include the Ombudsman, the Auditor-General and Audit NZ, and the judiciary (made up of judges and other officers). Further oversight comes from the investigations function of the Commissioner. The Police and Serious Fraud Office play a role in enforcing expectations to reduce fraud and corruption. Other agencies have lead roles in specific areas, such as public finance, procurement or privacy.

Responsibility for public service integrity also sits at the agency level, with departmental chief executives responsible to their ministers for the integrity and conduct of their agency. As with health and safety, individual public servants also have responsibility for ensuring their own actions meet expected standards and speaking up about any risks they might become aware of.

Some of the current work on public service integrity includes:

- Development of an updated Code of Conduct, and updates to standards and guidance relating to conflict-of-interest management and gifts and sensitive expenditure, amongst others.
- Establishment of the Integrity Champion network and work to support a culture of openness around raising integrity concerns, both informally and through formal speaking up processes.
- Anti-corruption work around public sector fraud and corruption and an all-of-government work programme to tackle foreign interference risks.

New Zealand has always ranked highly on international measures for integrity, although its score on Transparency International's Corruption Perceptions Index has recently been in decline. Recent external assessments[ii] describe New Zealand as having relied on a strong pre-existing culture of ethics and a trust-based public service with traditionally low corruption. Although there are differing views, concerns in these assessments include:

- a reactive approach to unethical behaviour rather than proactively strengthening the system to prevent it,
- weak formal checks and balances in key areas (e.g. lobbying) compared to other jurisdictions, and
- a lack of overarching anti-corruption strategy and leadership.

Royal commissions of inquiry and other integrity investigations and reviews over the last few years have also identified challenges in areas like conflicts of interest, unauthorised disclosure, whistleblowing processes, and sensitive expenditure.

Trends and drivers

While New Zealand already faces challenges, there are trends and drivers that will continue to affect the context in which public service integrity needs to be upheld. Some of these trends present opportunities that can be built on, while some of them pose challenges.

[ii] For example, the OECD report on *Drivers of trust in public institutions in New Zealand* and the UN's *Country review report of New Zealand*.

Social trends around increasing polarisation and faltering social cohesion (amplified by mis- and dis-information), and demographic change may alter the fundamental societal values that dictate how integrity is defined and what it should mean in a public service context. Although public service integrity is a long-standing tradition outlined in the Public Service Act 2020, we still need to ensure that its relevance remains evident in contemporary contexts.

The media has an important integrity role in scrutinising and reporting on government, and changes in the media landscape present both challenges and opportunities. Some media trends could lead to increased availability of information and public participation, while other trends (including pressures on traditional media) could impact the ability of the public to hold the public service to account.

Growth in transnational and serious organised crime in New Zealand (e.g. drug trafficking at the border) will also bring pressures for public service integrity and impact corruption levels.

Technological trends are grouped around the uptake of AI tools, as well as ongoing concerns about increasing cybersecurity risks and challenges around privacy.

AI will bring opportunities for increased efficiency and quality in general public service work and in specific work to address integrity issues. However, high-profile cases in public service delivery overseas have highlighted the types of integrity problems that emerge if AI technology is not adopted responsibly.

Principles around transparency and explainability, security, and accountability, as well as alignment with human rights and democratic values will be crucial for mitigating against the integrity risks of AI. Risks around data privacy and the transparency of technology are heightened when they are being used by external organisations contracted to provide public services.

Economic trends are front of mind, especially in terms of the direct impact that the fiscal context has on the public service and its work. Pressures on productivity and costs are known stressors for integrity, with risks that due process can look like a good corner to cut, or that disgruntled employees are motivated to become a source of insider threat.

Economic challenges continue to be unequally spread across the New Zealand population, with flow-on effects for public trust and social cohesion. The scale and complexity of climate change responses is likely to put significant pressure on public service resources and may change the nature of government services, with further implications for our integrity approach.[iii]

Political trends around the health of democracy and levels of politicisation of the public service (both at the level of individual states and at the international level) have further direct implications for public service integrity in New Zealand. They may pose risks to public service principles such as political neutrality and merit-based appointment, with corresponding impacts for public trust and the relationship between the public service and government.

[iii] For example, Cyclone Gabrielle was the costliest weather event ever on record for the Southern Hemisphere. Climate change will bring an increasing number of severe weather events, so we will continue to face recovery costs like this.

Relatedly, the state of multilateralism and a potential trend towards deglobalisation are likely to have cultural impacts in terms of global leadership and who sets the tone in the integrity landscape.

These trends could interact with each other in unexpected ways, producing any number of possible outlooks with different impacts for the health and resilience of our public integrity system. We present three hypothetical mini-scenarios that explore some of these interactions:

- **'The boiling frog' –** Integrity conditions might decline slowly as corruption and transnational crime increase, cyber security and data mishandling risks grow, and social cohesion deteriorates amid increased polarisation.
- **'Integrity in freefall' –** Integrity conditions might worsen much more quickly in the face of global problems that draw attention and resources, like war, climate change impacts, and disruptions to international trade. With resources diverted to these major challenges, the public service might allow integrity to slip, failing to protect the public interest and losing public trust. Some actors might then exploit public mistrust to attack the public service, while destroying the remaining oversight mechanisms that protect against corruption.
- **'Integrity at the centre' –** Alternatively, New Zealand might strengthen public service integrity, cooperating internationally to address corruption and integrity risks. The public service could take advantage of innovations to deliver better services and improve transparency and responsiveness, collaborating with the private sector and civil society. Conversations about the importance of public integrity would build across all sectors, with New Zealand leading the world on integrity and public service quality.

Desired future state and options to get there

Within the framework of the Public Service Act 2020, the Commission's integrity work is intended to support the long-term outcomes of a public service that:

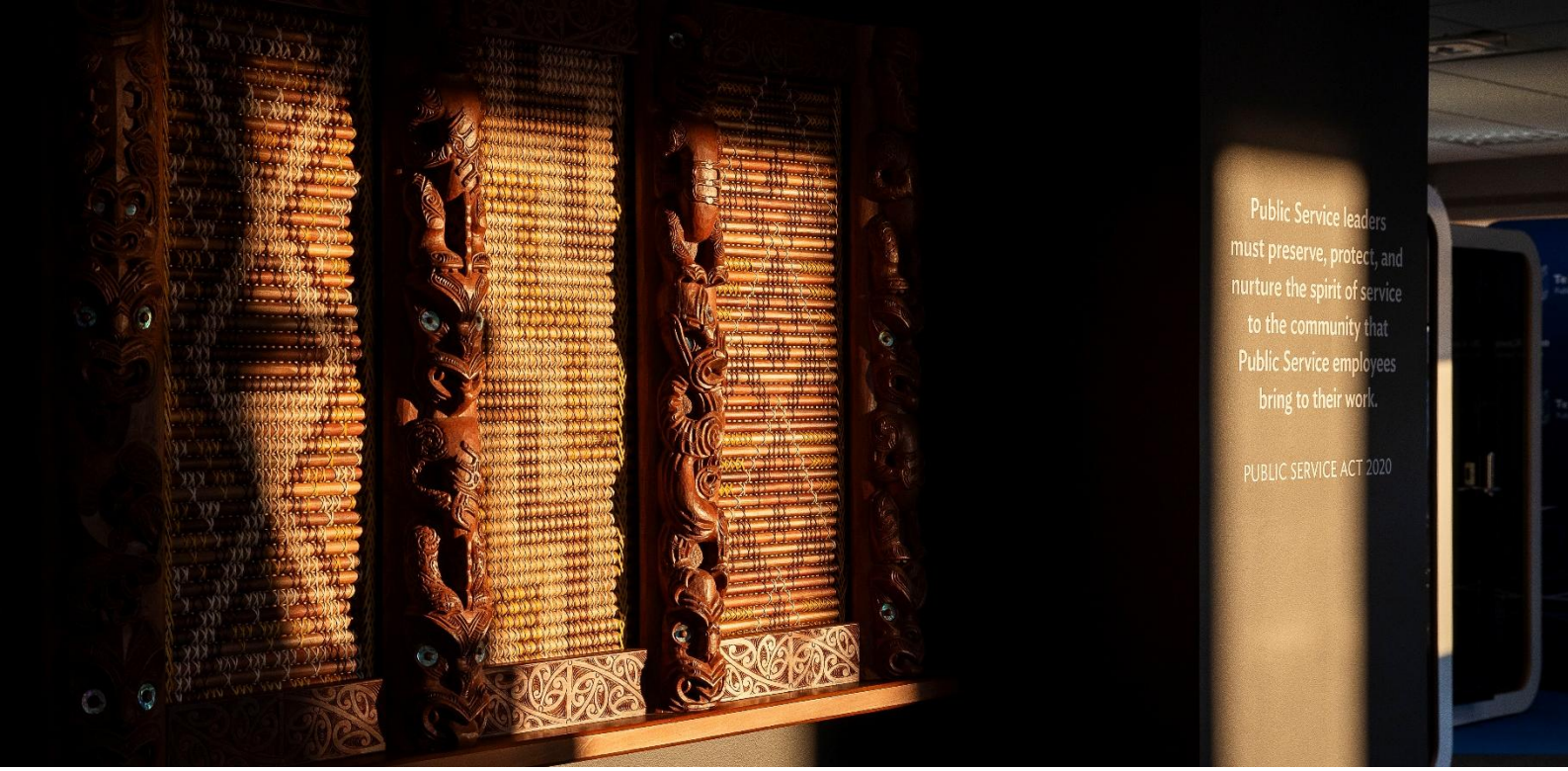
- has a strong and unified culture of integrity, which consistently upholds expected standards of behaviour,
- is responsive, politically neutral, and offers free and frank advice to the government of the day,
- holds the trust and confidence of New Zealanders,
- improves performance and reduces costs (especially for enforcement and correcting or 'putting things right'), and
- maintains its international reputation for integrity and effectiveness.

To reach these goals, we will need to strike the right balance between a rules-based approach and a more cultural and values-based approach. This balance will ensure that we have an absence of corrupt behaviour and the presence of a set of positive behaviours like transparency, accountability and effectiveness.

While we identify a range of options that span the dimensions of the OECD *Recommendation of the Council on Public Integrity* in this briefing, there are a few key areas where taking action is likely to serve us well regardless of how the identified trends play out:

- **Data and measurement** – Ensuring we have a strong understanding of our performance across all the many different dimensions of integrity will be essential for identifying challenges as they arise, setting aspirations, and having the data to design appropriate responses.
- **Workforce development** – Strong induction practices and regular ongoing training would build a learning culture around integrity. They would also allow flexibility over what content should be delivered based on the context and support a level of consistency across different agencies. Deliberately recruiting people who have high integrity and tendencies towards ethical behaviour will ensure our public service workforce is well set up to address integrity risks. Screening out people who do not have high integrity directly reduces the risks of insider threat and foreign interference.
- **Public education** – Given the significant impact that conditions across the whole of society have on public service integrity, ensuring a strong understanding among the public of the value and benefits of public service integrity, the specifics of how it functions, and the pressures it is under will contribute to our national resilience to integrity risks.
- **Fraud and corruption** – Many of the identified trends are likely to create conditions that are more favourable to instances of fraud and corruption. Building our understanding of these risks and how they can be reduced (including by strengthening our culture of integrity) would help us meet international anti-corruption commitments, save money, and build trust.
- **Coordination and alignment** – In any system that involves a range of players with different roles and responsibilities, it is important to pay attention to where there may be overlaps or gaps. Focusing on coordination and alignment will ensure that any gaps in our system are not able to be exploited by those not acting in the public interest.

Regardless of how trends play out in the future or of any specific policy options, it is clear that integrity is of foundational importance to the public service and government and must be preserved and strengthened.



Kōrero Whakataki | Introduction

The Public Service Act 2020 (the Act) introduced the requirement for every public service department to produce a long-term insights briefing every three years. The briefings are a tool to help the public service fulfil its stewardship responsibility. It is important that the public service looks forward so that we can effectively serve New Zealand not just today but into the future.

The briefings ensure that public service departments are thinking about the more complex long-running issues facing society and are exploring the skills and actions that might be needed to respond to these issues. The briefings are also intended to provide information and analysis to inform public debate on important issues and support democracy by giving parties from across the political spectrum information they can use to help develop their policies. The briefings are prepared independently from ministers, as required by the Act.

This is the second long-term insights briefing produced by Te Kawa Mataaho Public Service Commission (the Commission).

Its development began with internal discussions and desktop research about possible topics that may be of interest to the Public Service Commissioner (the Commissioner) and Commission. This included consideration of the Commission's specific roles and functions and reflection on the results of consultation in 2021 on the topic for our first long-term insights briefing.

We went out for consultation on a shortlist of three possible topics in September/October 2024. Submissions indicated interest in the topic 'the future of public service integrity.' This was the topic selected by the Commissioner to take forward for the draft briefing. In making this decision, he considered the purpose of the briefings, the matters relevant to the functions of the Commission, and the feedback from public consultation on the briefing topic.

We then shaped that topic into a focus question:

> ***How can New Zealand proactively address and prepare for public service integrity challenges in 2040?***

The briefing was drafted based on desktop research and data from other Commission work programmes, as well as workshops with internal and external expert stakeholders. It was also informed by another round of public consultation, where we received comments on a full draft of the briefing (see Appendix 1 for more information on the consultations). This is the final completed briefing.

Definitions

The following key terms are used throughout this briefing:

Public service integrity means public organisations and individual public servants behaving in line with the professional standards and expectations that uphold the public interest over individual or private interests.

In the New Zealand public service context, our framework of ethics is made up of the professional standards and expectations found in the Act's purpose, principles, and values, as well as in the public service Code of Conduct, model standards, and guidance. These are on top of basic expectations for general compliance with the law. These standards and expectations apply to the public service as a whole in the course of their work. This is different from the personal moral compass of each individual.

Corruption often accompanies discussions of public service integrity. In a public sector setting, a common understanding of corruption is the abuse of entrusted authority for private gain, covering many types of behaviour including bribery, cronyism, and misuse of information.[1]

Integrity and corruption are often understood as the two sides of one coin, with an increase in integrity leading to a decline in corruption. However, not being corrupt is not the same as having integrity, and public service integrity includes a wider set of behaviours than simply being non-corrupt.[2]

An integrity system encompasses the policies, practices, and integrity institutions that "contribute to the integrity performance of the government (national or local) at the heart of the integrity system."[3] In New Zealand, the **public integrity system** supports the integrity of the political and electoral system and judiciary (judges and other officers), as well as public agencies. The performance of public integrity systems is influenced by the national context which includes media, civil society, business and societal values and attitudes.

As a subset of the public integrity system, New Zealand's **public service integrity system** includes organisations that work together to set out expected professional standards and practices and provide oversight over compliance with those standards.

Some of the core organisations are the Public Service Commission, the Office of the Auditor-General (OAG), and the Office of the Ombudsman (Ombudsman). It also includes public institutions with roles and remits that cover law enforcement, or other specific integrity matters (e.g. the Serious Fraud Office, New Zealand Police, Privacy Commissioner).

Although this briefing is focused on their role in public service integrity, these institutions may also have roles at the wider public integrity or national levels (e.g. the OAG in local government or the Serious Fraud Office in the private sector).

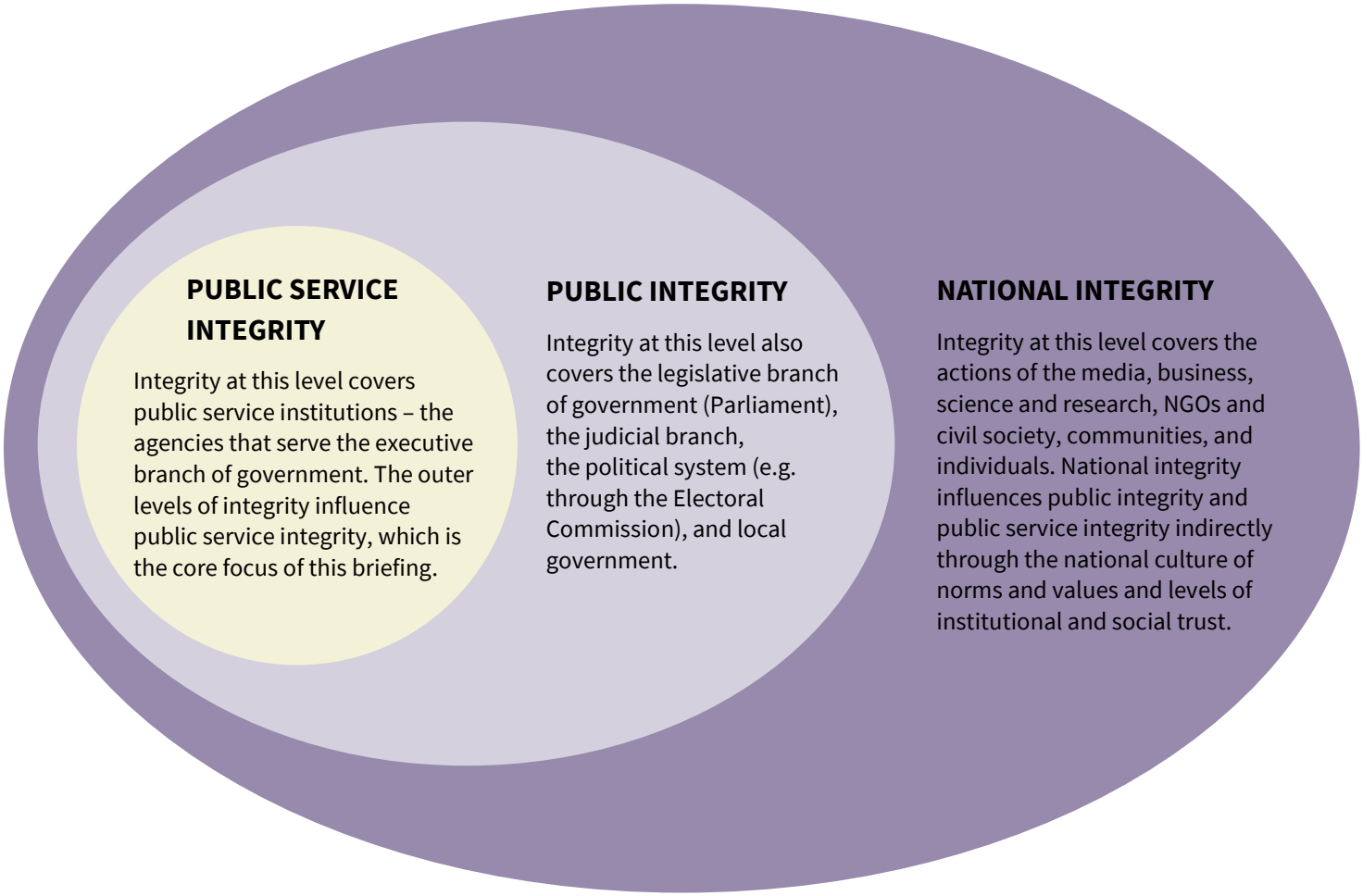


Figure 1: Public service integrity in context

In addition to agencies with specific roles, New Zealand's devolved public management model means that all individual public service agencies (i.e. chief executives and their staff) have responsibility for managing their own internal integrity matters, supported by advice, guidance, and accountability from oversight bodies.

Scope

This briefing is intended to focus on the aspects of New Zealand's public integrity system that are specifically relevant to the role and remit of the Public Service Commission and statutory functions of the Commissioner.

The Commissioner's role in promoting public service integrity includes setting standards for conduct at the individual public servant level, looking at integrity at a public service agency level, and considering how the system functions as a whole and how various parts operate together.

We refer to these aspects of integrity under the umbrella of 'public service integrity,' which separates them out from the broader elements of public integrity such as integrity in political institutions. The Commissioner's role also extends into parts of the state services (wider than the public service) and public sector (wider again).[iv]

[iv] The 'public service' is made up of departments, departmental agencies, interdepartmental executive boards, and interdepartmental ventures listed in Schedule 2 of the Public Service Act 2020. The 'state services' includes the public service and Crown entities, Crown-owned companies, Police, the defence force, schools and teachers,

While these terms have specific meanings in particular contexts,[4] they are not generally meaningful distinctions for the public. We therefore refer to 'the public service' and 'public servants' throughout this briefing in an inclusive sense, as we mostly consider general forms of integrity that should apply throughout the public sector. Where we refer to specific integrity requirements with narrower application, this will be clear from context.

Throughout the briefing, we comment on relevant parts of the broader integrity system, while keeping a focus on our areas of specific responsibility, including the structures and operations of the public service integrity system as a whole. The briefing explores possible future challenges to public service integrity and identifies possible courses of action to build on our high trust integrity environment.

We note that the long-term insights briefing from the Serious Fraud Office addresses the question of how to respond to emerging trends in detecting fraud and corruption in New Zealand. We are working closely with them in this area and maintain an interest in any of their findings that relate to fraud and corruption by public servants. Some key areas of overlapping interest between our two briefings (and work programmes) include improvements to information sharing and coordination between key oversight agencies, lowering barriers to speaking up with complaints and protected disclosures, how AI can support better detection and response to issues, and the importance of robust measurement and indicators.

Why integrity is important

Integrity is a fundamental characteristic that New Zealanders expect of their public service and is a hallmark of a functioning democracy. The public service is entrusted with resources and powers, in some cases coercive ones, and integrity is about the behaviour and practice that ensure we use those powers and resources effectively, honestly and accountably.

A public service that acts with integrity and upholds the public interest helps to maintain the trust and confidence of New Zealanders in that public service. That trust and confidence gives us the social licence to operate legitimately and effectively. High trust is positively correlated with higher quality governance and lower corruption.[5]

Trust also improves public participation, cooperation and compliance with law, policy and regulation, which helps the government to deliver more effectively.[6] Trust acts as a bridge between government institutions and the communities they serve or regulate, reassuring all people that they will be treated fairly. In this way, integrity has inherent value for supporting constitutional and democratic government and meeting public expectations. A high-integrity public service can act as an example to other sectors.

Integrity also has tangible benefits. Getting integrity right can save money. Integrity issues like fraud and corruption directly impact public money, while organisations with good governance, risk-management, accountability, and decision-making (e.g. robust procurement processes) are less likely to waste resources. Integrity lapses are often linked to failures in service delivery.

and the Reserve Bank. The public sector covers all public bodies including all branches of central government and local government

High integrity reduces the amount of money that has to be spent on monitoring and enforcement, reviewing challenged decisions, or fixing things that have gone wrong.

Integrity strengthens public service efficiency, effectiveness, and responsiveness to the public and the government by keeping a focus on the highest standards of political neutrality, stewardship, and professional competence. This supports the public service to implement the policies of the government of the day and act in the long-term public interest. It also builds trust between agencies that allows them to work together better, and to work more effectively with their contracted service providers.

Finally, integrity is a key and often overlooked driver of performance improvement. It requires strong governance and accountability mechanisms that also support the public service to learn and improve.

The Commissioner was led to focus on this topic because of:

- integrity's inherent value for democracy,
- its instrumental value for the efficiency and effectiveness of government,
- the increasing threat it is under from emerging trends and in other countries, and
- the level of public support that the topic received in consultation.

Te Tiriti o Waitangi | The Treaty of Waitangi

The Treaty of Waitangi is an integral part of New Zealand's constitutional framework, setting the foundation for an ongoing partnership between Māori and the Crown. The Treaty and New Zealand's general approach to public integrity are mutually reinforcing. The public service has a role in supporting the Crown in its relationship with Māori, outlined in section 14 of the Public Service Act 2020. This means the Treaty forms part of the architecture of New Zealand's public integrity system alongside the expectations outlined in the Act's purpose, principles, and values. For all public servants, the interests of Māori and the Treaty are important considerations for interpreting what constitutes the public interest.[7]

Public service leaders have specific responsibilities for developing and maintaining the capability and capacity of the public service to engage with Māori and understand Māori perspectives. The Commissioner and public service chief executives are accountable to their Minister for upholding their responsibilities to support the Crown's relationships with Māori. The Commissioner and public service chief executives are also responsible for operating employment policies that recognise the aims, aspirations, employment requirements, and need for greater involvement of Māori in the public service.

Māori perspectives on accountability (which is an essential element of integrity) emphasise the importance of relationships to people within the organisation rather than the organisation itself, which centres individual behaviour and conduct. The OAG is exploring opportunities to ensure that New Zealand's system of public accountability aligns with Māori perspectives; for example, by "listening deeply to what Māori value in the public sector," two-way education that connects with Māori communities, and generally communicating about how the public service delivers value in a way that reaches Māori audiences.[8]

Efforts to strengthen the Crown's relationship with Māori have built a greater understanding of te ao Māori principles and approaches to integrity. For example, concepts of tikanga such as "*tika* (true, right, fair, just), *pono* (honest, genuine, sincere), *aroha* (empathy, compassion, care), *mana, whanaungatanga, kotahitanga and manaakitanga*" have clear resonance with public service integrity concepts.[9] The public service's capability to support the Crown in its relationships with Māori is therefore complementary to its integrity capability.

Te Ara Tikanga o te Tapatahi me te Tutukinga Mahi a Aotearoa o te Wā | New Zealand's Current Integrity Approach and Performance

The New Zealand public service has some of the highest levels of integrity, trust and effectiveness, and lowest levels of corruption of any civil service in the world. This is evident in international assessments of our performance discussed later in this section.

However, there are some concerning international trends that pose a risk to our position and suggest that our integrity system is under pressure (see discussion in the section on trends and drivers). Many of our international comparators are also facing challenges to public integrity (see Appendix 4), in some cases sparking wide-ranging integrity and anti-corruption reforms as in Australia.

Some recent assessments of our approaches to integrity and corruption (discussed later in this section) suggest that New Zealand is not as prepared for these risks as we could be. The assessments point to complacency, declining performance, a lack of system leadership and coordination, and reduced resilience to domestic and international fraud, corruption and bribery risks.

This section starts by outlining two different approaches to public service integrity that have had different emphasis in New Zealand at different times. It then looks at external assessments of New Zealand's current performance, including its rankings on international integrity and anti-corruption indices.

To give context to our current approach and performance, this section then outlines current activities that support public integrity with reference to the 2017 OECD *Recommendation of the Council on Public Integrity* (the OECD Recommendation).[10] In line with the scope of this briefing, this section focuses on activities that are specifically relevant to the role of the Public Service Commission and functions of the Commissioner. Where appropriate, we also make high-level comments on aspects of the broader public integrity system.

Approaches to public integrity

Approaches to upholding public integrity have tended to fall into the category of either 'values-based' or 'compliance-based'. A values-based model involves clear rules against illegal behaviour, and consequences that are applied when these are breached, but the overall focus of this approach is on results. The emphasis is on what should be aspired to and achieved through ethical behaviour, rather than on the behaviour that should be avoided.

At the other end of the spectrum, a compliance-based model has a focus on strict adherence to procedures and rules that often define what public servants should *not* do. In this model, the emphasis is on policing actions and catching wrongdoing.

In the past, New Zealand's public service model has been more compliance-based, with detailed rules enforced as part of a traditional hierarchical bureaucracy. Over the course of the twentieth century, New Zealand moved away from this traditional model and took on a more devolved model of public service management that emphasised formal contracts. Although no longer based on detailed rules, this approach was still focused on compliance.[11]

As in other countries that also changed their public service model, there was some concern in New Zealand that this new model might be reducing a sense of loyalty and 'public service spirit'. Beginning in the late 1980s, this led to more emphasis on ethical values and standards, in line with a values-based approach. Activities in this area included a code of conduct and ethics education.

Research has illustrated that underlying cultural values and expectations have a significant influence on ethical behaviour, and internationally "much of the emphasis in building ethical environments and in combating corruption has moved from legal enforcement of ethical rules towards trying to change cultural attitudes."[12] In a 2023 report, the OECD described New Zealand's efforts as still focused on identifying and correcting unwanted behaviour, although it noticed more recent attempts to invest in prevention, such as training.[13]

There is now widespread recognition that elements of both compliance and values are necessary in any system of public integrity. The more important issue is to get the right balance between them and make sure our approach is suitable for the New Zealand context.[14] The 2017 OECD Recommendation reflects this view.

A values-based approach needs to be reinforced through elements of compliance like monitoring and accountability, while compliance systems are most effective when they are aligned with values. Both help to create an environment that supports positive ethical behaviour. This is also supported by research in behavioural science, which finds that too much emphasis on controls and penalties can crowd out natural motivation for integrity and 'doing the right thing'.[15] Within this balanced approach, individuals take on shared responsibility for behaving with integrity, just as responsibility for health and safety sits with everyone.

Assessments of our performance

There are several international rankings that provide important measures of New Zealand's recent performance in relation to public integrity. In general New Zealand ranks highly across international measures, such as the World Bank's World Governance Indicators for the control of corruption and the European Research Centre for Anti-Corruption and State-Building (ERCAS) Public Integrity Index.

New Zealand also ranks near the top of Transparency International's Corruption Perceptions Index as one of the countries with the least perceived corruption, although our overall score has been declining. The index is one of the most well-known corruption indicators worldwide and is based on expert perceptions. Between 2011 and 2023, New Zealand's country score fell 10 percentage points, from 95 to 85 (where 0 means highly corrupt). In 2024, New Zealand ranked fourth, the first time it has placed out of the top three. Other similar countries have also had their scores fall, which suggests that external forces other than the work of key agencies are having an impact.[16]

These international measures provide a useful high-level view of how New Zealand generally ranks against other countries, but they are less helpful for understanding performance in terms of activities intended to encourage positive integrity behaviours.

In their 2024 assessment, Transparency International New Zealand (TINZ) recognised that New Zealand has a relatively strong culture of integrity and ethical behaviour across most of society, but raised some concerns about increasing corruption pressures and the lack of a strategic approach.

They point to challenges in responsibilities around anti-corruption, including overlaps and gaps, a lack of coordination across different agencies, and the lack of an agency which has anti-corruption as its core aim.[17]

Other external assessments of New Zealand's public integrity have similar findings about the risks of complacency in light of the increasing pressures facing our otherwise strong national integrity context. In their 2024 report on *Drivers of trust in public institutions in New Zealand*, the OECD also noted New Zealand's lack of a comprehensive integrity strategy.[18]

The United Nations Office on Drugs and Crime's *Country review report of New Zealand* adds to other external assessments with a view of New Zealand's progress under the Convention against Corruption.[19] Overall, there is some concern about New Zealand's readiness to address specific risks around corruption, fraud, bribery, and foreign interference. According to external assessment, these come from: our historical focus on reactive rather than preventive measures for unethical behaviour, a lack of formal checks and balances in relation to key vulnerabilities (such as lobbying, political donations, and beneficial ownership transparency), misalignment between standards and practice, and slow adoption of technology.

The Commission also has data on New Zealand's integrity performance. From 2007 to 2013, the Commission ran a three-yearly Integrity and Conduct survey, which collected data on public servant perceptions of integrity or integrity breaches. In 2025, Te Taunaki – Public Service Census included questions about public servants' views of integrity matters within their own organisation.[20]

There are several components of this. The first is a series of questions that address each of the five public service principles. The responses to these questions in the latest census indicate that free and frank advice, political neutrality, openness and transparency, and stewardship are all tracking relatively well. But only 44% of respondents were confident that people in their organisation get jobs based on merit. This is slightly higher than the 42% result from a 2013 survey, but still notably low.[21]

Although the evidence is limited, concerns seem to centre on public servant appointments being pre-determined based on favouritism,[22] rather than political interference. Some open-ended comments captured in the summary report also expressed concern about the interaction between merit-based appointment and diversity/inclusion.

Secondly, a series of questions asked about the integrity culture of respondents' organisations.

- 90% of respondents know what to do if they experience or witness wrongdoing or inappropriate behaviour in the workplace.
- 83% agreed that their manager leads by example in ethical behaviour.
- 82% trusted their work colleagues to do what is right. This was an increase from the 78% who agreed with that statement in 2021.
- 74% agreed that the culture in their organisation supports people to act with integrity.
- 70% felt safe speaking up about wrongdoing or inappropriate behaviour in the workplace.

Thirdly, a series of questions asked about experiences of harassment and bullying, and about processes for reporting unacceptable behaviour. Recent results indicate that there are some key barriers to reporting bullying and harassment, as only 52% of those who reported experiencing this behaviour in the past 12 months went on to report it.

The top reasons given for not reporting bullying and harassment were 'I did not think action would be taken' (52%), 'I was worried about possible retaliation or reprisals' (48%), and 'it could affect my career' (44%). Furthermore, only 14% of those who were subjected to bullying or harassment were satisfied with how these matters were resolved by their organisation.[23]

The Commission's Kiwis Count survey that happens four times a year provides data on the public's level of satisfaction and trust in the public service going back to 2012. The latest data indicates that 81% of New Zealanders trust public services based on their personal experience, and 67% of respondents think the public service is generally honest.[24] But the 2023 OECD Trust Survey found that only 42% of New Zealanders believe that public employees would refuse bribes to speed up access to public services (although still above the OECD average of 36%).[25]

Hāpai Public, formerly known as the Institute of Public Administration New Zealand (IPANZ), also runs an external survey of public servants. In the 2022 IPANZ survey, almost a quarter of respondents indicated that they had personally witnessed someone working for their agency behaving in a way that they thought was a breach of the Code of Conduct in the past 12 months.[26] This finding was limited by the survey's low response rate.

The most common perceived breach in the 2022 IPANZ survey was bullying, which fits with the findings of large-scale research into management of whistleblowing and the Commission's own surveys including the Public Service Census discussed above.[27]

In a recent performance audit, the Office of the Auditor-General (OAG) examined how the Commission promotes integrity in the public service through its standards and guidance.[28] The audit report finds that the Commission understands the importance of promoting integrity and carries out a range of activities to increase public servant awareness of expected behaviours. It finds that the Commission also recognises a need to be more proactive and has made or is planning useful improvements.

Recommendations align with actions already underway, such as refreshing the Code of Conduct and developing a strategy for the Commission's integrity work. Other recommendations include a more systematic approach to data collection and integrity performance measurement, and ensuring that the Commission's strategy for integrity work is informed by key risks and vulnerabilities. The report also recommends the Commission give more thought to how it can influence integrity in the wider public service (such as Crown entities).

Royal commissions of inquiry[v] and other, more specific integrity-focused inquiries[vi] have also pointed to areas for improvement. Common themes across integrity inquiries include conflicts of interest, political neutrality, speaking up/complaints processes, overlooking poor behaviour, and sensitive expenditure.[vii]

[v] For example, the Royal Commission of Inquiry into Historical Abuse in State Care and in the Care of Faith-based Institutions (Royal Commission into Abuse in Care), Royal Commission COVID-19 Lessons Learned, and Royal Commission of Inquiry into the Terrorist Attacks on Christchurch Mosques.

[vi] For example, the review into Fire and Emergency's workplace culture and complaint handling practices (May 2025), inquiry into the protection of personal information (February 2025), review of the administration of the Accredited Employer Work Visa Scheme (February 2024), and the review of sensitive expenditure and gifts associated with farewell and welcome events for chief executives (August 2023).

[vii] Sensitive expenditure is any spending by an organisation that could be seen to be giving private benefit to a staff member, their family or friends.

Across these different measures and assessments, it's important to consider what is actually being measured. Many integrity indicators are based on perceptions of integrity and it is often unclear how reflective these are of underlying conditions.

They can make it challenging to know whether improvements will come from addressing behaviours directly, or through other approaches such as communication to improve visibility of positive integrity behaviours. Similarly, where perception measures are high, they may lead to complacency and an unwillingness to look at things more closely. These measures also create challenges for understanding differences between agencies, only giving a general view across the public sector. This is why the Public Service Census is so important, because it reveals specific areas of strength and weakness in individual agencies, which they then develop agency action plans to address.

Options to address concerns raised in international assessments and specific issues apparent in the Commission's own data are discussed later in this briefing. These include options for strengthening and increasing measurement of integrity indicators, improving speaking up processes to address harassment and bullying, and addressing concerns about merit-based appointments as part of options for improving workforce capability.

The OECD Recommendation

Since the 1990s, the OECD has produced frameworks that help assess a country's integrity measures and initiatives, and compare between different countries. In Australia, the pillars of the 2017 OECD Recommendation have been used to structure the recommendations of the Australian Public Service (APS) Integrity Reform Taskforce.[29] In 1999, the State Services Commission used the previous OECD framework to assess New Zealand's approach to ethical conduct, which is a helpful point of comparison for this briefing.[30] The framework is flexible enough for countries to use different practices based on the specific nature of public integrity risks and the legal, institutional and cultural contexts in each country.

Although it has a broader focus than just anti-corruption activities, the OECD Recommendation frames public integrity as a necessary and sustainable response to corruption risks. Historically, approaches to corruption have often been developed as a response to specific scandals or designed to prevent particular forms of behaviour. This means they have focused mainly on how agencies and institutions should be organised or on the relevant laws and regulations.[31] Although it still emphases control, oversight, and enforcement, the OECD Recommendation places a greater focus on building a culture of integrity as a defence against corrupt activity.

Integrity Framework from the 2017 OECD Recommendation

The 2017 OECD Recommendation has three pillars – **system**, **culture** and **accountability** – each with several factors that contribute to it.

A **coherent and comprehensive public integrity system** can be achieved through:

- Clear institutional responsibilities and arrangements for cooperation
- Commitment to integrity at the highest political and management levels
- High standards of conduct that go beyond minimum requirements
- An evidence-based strategic approach informed by performance data

A **culture of public integrity** can be achieved through:

- Promoting a whole-of-society culture of integrity
- Integrity leadership from managers at all levels
- A merit-based, professional public service
- Training and guidance for public servants
- An open organisational culture where integrity concerns can be discussed freely

Effective accountability can be achieved through:

- Internal risk management and control systems
- Enforcement mechanisms for detecting, investigating and sanctioning breaches of public integrity standards
- Oversight and control by external bodies
- Promotion of transparency, open government and stakeholder participation in the development and implementation of public policies

System

Commitment and responsibilities

In New Zealand, several institutions have responsibilities for upholding public integrity. The Public Service Commissioner (the Commissioner) has a core role in this area, with functions that include promoting integrity, accountability and transparency as required by the Public Service Act 2020 (the Act). This integrity responsibility extends to the public service and some areas of the public sector. The key elements of this are to:

- issue codes of conduct,
- set standards and pathways for enhancing public service integrity,
- build public servant capability through induction, guidance, and education,
- promote merit-based appointment and openness,
- emphasise leadership of public service integrity,
- hold agencies accountable, and
- lead on open government.

At the agency level, under the Act chief executives of departments and departmental agencies are responsible to their Minister for the integrity and conduct of employees. The Office of the Ombudsman (Ombudsman) is a key oversight body, handling complaints and investigating the conduct of public sector agencies.

In this sense, the Ombudsman acts as oversight mechanism for the public service, with greater independence than the Public Service Commissioner. The Ombudsman can also receive and refer disclosures about possible wrongdoing in the private and non-governmental organisation (NGO) sectors, and can provide advice and guidance to anyone, including potential disclosers and employers in the private and NGO sectors.

The Office of the Auditor-General (OAG) is responsible for auditing public organisations, including the public service, Crown entities, and local councils.

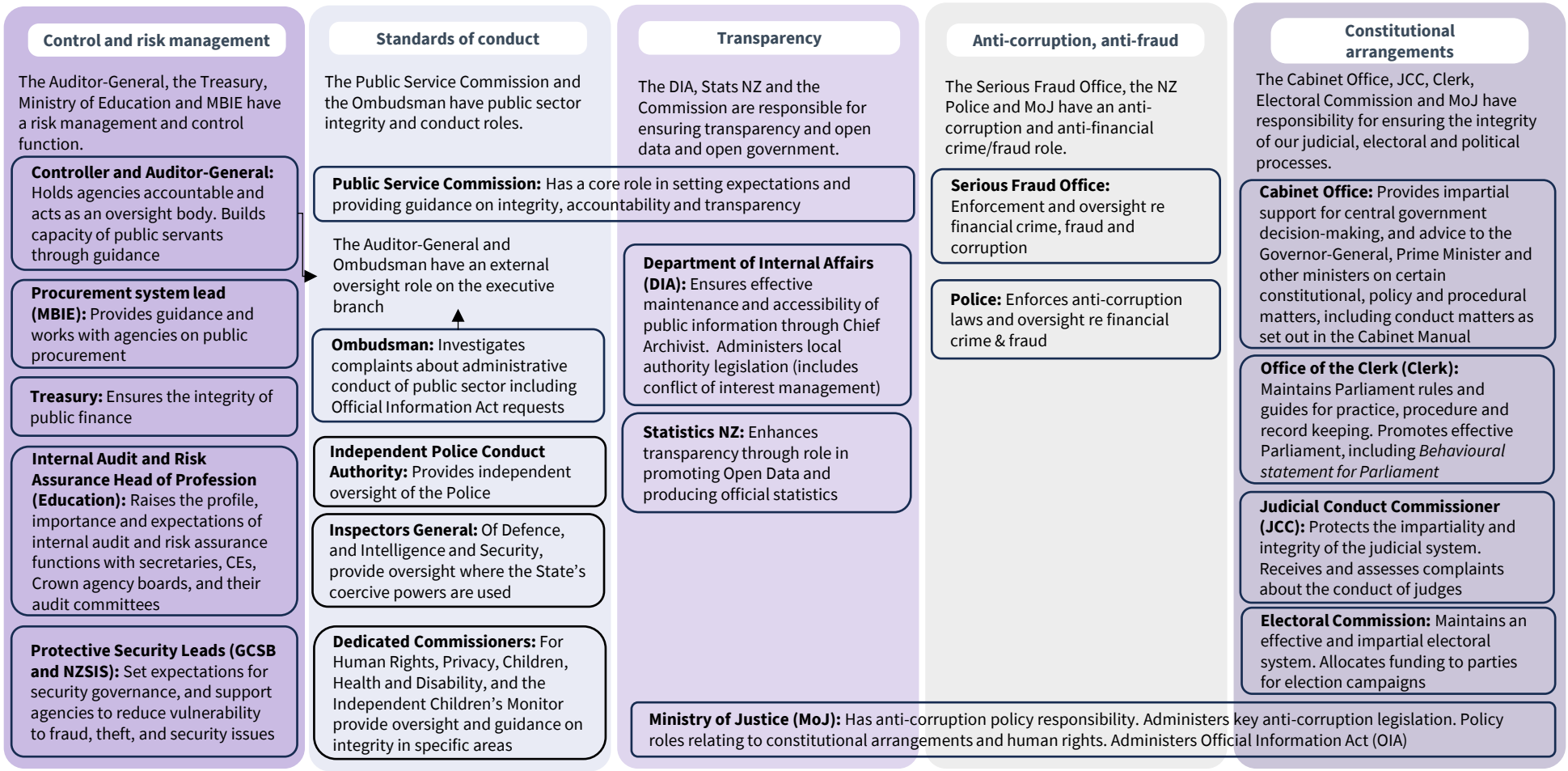
Other agencies have responsibilities for designing, leading and implementing elements of the public integrity system in specific areas, such as the system lead for procurement in the Ministry of Business, Innovation and Employment. The Ministry of Justice, the Serious Fraud Office (SFO), the Police, and the Commission all have roles in anti-corruption activities. A snapshot of New Zealand's integrity institutions is provided in Figure 2 below.

The OECD framework highlights the need for cooperation between agencies with institutional responsibilities for integrity to avoid gaps and overlap, prevent fragmentation, and share lessons.[32] Although responsibilities in New Zealand's system can appear fragmented, there are coordination mechanisms across the system.

For example, the Commission recently established the network of Integrity Champions (made up of senior leaders from public service departments and some large Crown entities), who work closely with their leadership teams to coordinate good practice. They also provide a communication channel to staff in their agencies and act as a testing ground for ideas at the system level. The Commission participates in the Joint Agency Integrity and Conduct forum (JAIC), a forum for the many operational aspects of integrity and corruption work within agencies, chaired on a rotating basis to increase agency buy-in. The Commissioner's role in convening the Public Service Leadership Team (PSLT) and appointing system leaders also presents coordination opportunities.[viii]

[viii] PSLT is convened under s 59 of the Public Service Act 2020 and system leaders are appointed under s 56.

Figure 2: Key public integrity institutions



Agencies in the 'Constitutional arrangements' box do not have explicit roles in relation to the public service and are not the central focus of this briefing

Standards

Our definition of public service integrity – behaving in line with the professional standards and practices that uphold the public interest over individual or private interests – relies on standards to provide clarity on expected behaviour across a range of situations. The standards are supported by procedures to address any breaches. Publishing standards of conduct (and procedures for enforcing them) also supports transparency by publicly affirming the values they contain.[33]

Principles and expectations relating to public service integrity come from many sources. The Act is a significant source, outlining a range of legislative expectations on public service chief executives, including to support the Crown in its relationships with Māori under the Treaty of Waitangi and maintain capability to engage with Māori and understand their perspectives. Other examples include the privacy principles in the Privacy Act 2020 or obligations regarding information and records management in the Public Records Act 2005. These pieces of legislation constitute mandated expectations set by Parliament for how the public service should behave. Professional groups across the public sector may also have standards and codes specific to their profession, such as those for lawyers, accountants, or health workers.

The Commissioner has a mandate to set minimum standards for integrity and conduct for much of the public sector, which are published as the *Standards of Integrity and Conduct* (the Code of Conduct – see Appendix 2).

Under the Act, the Code is binding on all agencies, groups and public servants to which the Code applies. This is reinforced through references in individual and collective employment contracts. Although they have been expressed in different ways over time, the Code reflects enduring qualities expected of the public service, such as political neutrality, professionalism, free and frank advice, trustworthiness, and working in the public interest (or 'spirit of service'). These values and principles have a long history back to New Zealand's Public Service Act 1912 and even further back to the public service of the United Kingdom in the nineteenth century. Work is underway to issue a refreshed Code reflecting the language used in the Public Service Act 2020.[34]

The Code is supported by model standards, which communicate best practice expectations and are designed to improve consistency in relation to specific topics. New or updated standards can result from Commission investigations, or may also reflect government priorities.[ix] The model standards are brought together with other guidance provided or endorsed by the Commission in *He Aratohu*: *A guide for public servants on matters of integrity and conduct* (see Appendix 3 for more detail on the topics covered in the model standards and *He Aratohu*). Standards and guidance are reinforced through communications, networks, learning opportunities, and other support.

[ix] For example, an investigation into the use of external security consultants by government agencies resulted in the creation of model standards on information gathering and public trust, in order to strengthen transparency and consistency across all government agencies.

Strategy and measurement

Strategies are a way of demonstrating a system commitment to integrity and can be used to clarify institutional responsibilities. In the OECD framework, a strategic approach involves setting objectives and priorities for the public integrity system and developing benchmarks and indicators to monitor implementation, performance and the overall effectiveness of the public integrity system. It does not need to be a single strategy document and could be part of other government strategies.

This is more in line with New Zealand's current way of doing things. Elements of the OECD's recommended strategic approach appear in several places:

- Part 1 of the Act, which provides the overarching strategic framework for public service integrity, supporting the Commission and other agencies to prioritise the most important elements of integrity for the New Zealand context.
- The OAG's integrity framework, which supports senior leaders and those in governance roles to self-assess their agency's integrity and develop their own agency-specific integrity strategies.
- The strategic intentions documents published by the Commission and others with leadership roles for the public integrity system, which clarify institutional responsibilities, priorities and objectives, and how they will be reported on (see Table 1 for a non-exhaustive snapshot of measures referenced).
- The Commission-led *Action plan to strengthen integrity, 2025-2028*, which describes the priority integrity work programme and how success will be monitored and evaluated.
- Action plans and work programmes for integrity, which are underpinned by their own problem analysis, policy development and risk assessments. These are used by agencies but rarely published.

Table 1: Snapshot of measures relating to integrity referred to in the Commission's strategic intentions

Measure/indicator	2015-19	2017-22	2021-25	2024-28
Kiwis Count – service quality score	✓	✓	✓	✓
Kiwis Count – trust in public services score	✓	✓	✓	✓
Kiwis Count – perceptions of ethical behaviour				✓
Maintains or improves country ranking in key cross-jurisdictional studies (e.g. Transparency International Corruption Perceptions Index)				✓
Public Service Census – adherence to principles				✓
Public Service Census – positive and safe workplaces				✓
Public Service Census – spirit of service				✓
System OIA and proactive release performance reporting done				✓
Progress against government targets	✓	✓		✓
Progress against Better Public Services milestones	✓	✓		
Commission stakeholder survey – questions around fit-for-purpose leaders and public service	✓			

New Zealand also has a Transnational Organised Crime Strategy 2020-2025, which identifies corruption as an important enabler of transnational organised crime and is supported by a Ministerial Advisory Group.[35]

Data on the overall effectiveness of the public integrity system are key to the development of any strategic approach. This is an area where New Zealand has typically relied on measures of people's perceptions of integrity and corruption, on which we usually score relatively highly. But these sorts of measures can conceal variation across different agencies and make it harder to determine how internal factors are influencing integrity, especially for smaller agencies. What constitutes strong integrity for a specific organisation depends to some extent on its specific working context, as this impacts the public's expectations of behaviours. The Commission has started to think about whether there are more detailed measures on various components of integrity and ethical behaviour that could help us understand our performance. For example, data from Te Taunaki – the Public Service Census can help us identify system-level and agency-level integrity trends, gaps, and opportunities.

There are also efforts underway to improve oversight and transparency around matters of public servant misconduct as part of amendments to the Act in progress. These include a requirement for agencies to notify the Commission before they begin misconduct and serious misconduct investigations involving senior public service leaders, and to report annually to the Commission on the outcomes of any of those investigations closed in the past year.

Culture

Whole-of-society culture of integrity

Public service integrity is influenced by the national civic culture, the ethical culture of the private sector and the ethical cultures of the professions and groups to which public servants belong.[36] This means that the private sector, civil society and individuals also play a role in promoting a culture of public integrity. Suggested actions in the OECD Recommendation include engaging relevant stakeholders in the development and implementation of the public integrity system and raising awareness of the benefits of public integrity, such as through civic education.

There has been limited action in this area in New Zealand, perhaps due to a reliance on a national culture which historically has had low tolerance for corruption and high trust compared to other OECD countries.[37] Possible explanations for New Zealand's low levels of corruption include our small population and unitary system of government, social and cultural tendencies towards conformity and egalitarianism, and the foundational role of the Public Service Act 1912.[38] New Zealand is generally seen to have strong adherence to the rule of law – the idea that the law applies equally to everyone (including government, officials and citizens).[39]

Challenges described in external assessments include a cultural tendency towards pragmatism "where (especially petty) corruption is seen as wrong, but not as causing sufficiently significant levels of harm to be worth addressing."[40] There are also indications the New Zealand's national integrity culture has come under increased pressures in the past decade from a number of angles[41] – some of which are discussed in the next section on trends.

There are a few key examples of how the Commission communicates and engages with public stakeholders. One of the most significant examples of our stakeholder involvement is the Working with Survivors model standards, which were co-authored by the Stand with Pike Families Reference Group (FRG) and the Commission. The FRG led consultation with survivors of other national disasters, while the Commission led consultation with public service agencies, Police and Victim Support. The model standards themselves cover working with external stakeholders in times of crisis. New Zealand's work within the Open Government Partnership has also involved stakeholders in the development of integrity initiatives and promoted the benefits of public service integrity,[x] although it has faced resourcing and capacity challenges in recent years across both the public service and civil society.[42] And the Commission's awards and honours programme[xi] highlights for the public how the public service acts with integrity to make a difference for New Zealand by recognising excellent initiatives and individuals who demonstrate the public service values.

Integrity leadership

Research consistently shows that 'tone from the top' matters and chief executive and senior management leadership is critical to ensuring a culture of integrity within agencies.[43]

This is especially the case in New Zealand's public management model, where chief executives have substantial responsibility and freedom to manage their own agencies. But this freedom also comes with specific integrity responsibilities under the Act,[xii] which mean that chief executives are expected to:

- role model a culture of integrity through their actions, even when no one is watching,
- communicate how they expect public servants to behave, with clarity and consistency,
- create environments in which people speak up about possible issues/wrongdoing, and
- be prepared and willing to address unwanted behaviour.

In the most recent Public Service Census, 83% of respondents agreed that 'my manager leads by example in ethical behaviour' and 74% agreed that 'the culture in my organisation supports people to act with integrity.'[44] However, concerns about leadership capability not measuring up to expectations were raised in feedback from public consultation (and reflected in open-ended comments in the Census), especially in the context of high levels of organisational change.

[x] For example, one of the commitments under a National Action Plan involved the development of a civics education model that is available on the Ministry of Education website for adoption by New Zealand secondary schools. Other ad hoc engagement happens with universities and researchers on specific topics.
[xi] The awards include Te Hāpai Hapori Spirit of Service Awards, Te Rā Ratonga Tūmatanui Public Service Day Awards, and Te Tohu Manawaroa Commendation for Service.
[xii] These responsibilities are to: uphold the public service principles and ensure others do so too (s 12); preserve, protect and nurture the Spirit of Service (s 13); and ensure their agency complies with minimum standards of integrity and conduct issued by the Commissioner (ss 17, 19).

The Commission also has a key role in the management of integrity leadership. The Commissioner has a responsibility for appointing chief executives and managing their performance, convening the Public Service Leadership Team and appointing system leaders, and taking an interest in the leadership of the public service. In the Commission's own leadership role, we consider integrity as part of our general functions such as machinery of government decisions, settings for how agencies work together, and agency performance monitoring, as these also present opportunities for emphasising integrity expectations at a cultural level.

The Integrity Champions also play a leadership role in educating, training, and providing advice on integrity and conduct matters in their agencies. The Commission is working to improve leadership training and strengthen the role of Integrity Champions, so that leaders can continue to strengthen their integrity cultures.

Chief executives and other senior leaders (including Integrity Champions) are supported to navigate decisions with integrity by standards, guidance and advice from the Commission and other parts of the integrity system. For example, the OAG's integrity framework *Putting integrity at the core of how public organisations operate* offers a range of practical suggestions that agencies can use to uphold integrity and navigate ethical challenges.[45]

Workforce capability (merit-based appointment, training)

A merit-based, professional public sector dedicated to public service values and good governance is an important contributor to a culture of integrity. Appointment on merit is included in the Public Service Act 2020 as a public service principle and a requirement of chief executives. Merit has been a cornerstone of New Zealand's professional and politically neutral public sector since the 1912 Public Service Act and is a key element of our recruitment processes.

The Commissioner's Workforce Assurance Model Standards and the Protective Security Requirements both support the integrity of merit-based appointment processes by detailing a range of specific expectations for agencies when recruiting employees and contractors. The Crown Entities Act 2004 also provides for the impartial selection of qualified candidates. The Minister for the Public Service is currently progressing work to strengthen merit-based appointments further in an amended version of the Act (e.g. by removing assumptions of automatic reappointment of public service chief executives, to ensure contestable processes). The Commissioner's employment relationship with and performance management of chief executives (in consultation with ministers at key points) is a deliberate design feature that supports the neutrality of the public service and builds public trust and confidence in government.

In both the public and private sectors, ethical training as part of professional development is considered an essential part of building a culture of integrity within organisations.[46] As part of its capability-building role, the Commission provides guidance and education to agencies on applying public service integrity standards in the workplace. These have taken various forms, ranging from one-to-one advice, one-to-many webinars and presentations, and – more recently – a range of self-driven learning modules and videos.

Training is a key area for balance between a compliance-based approach to integrity and values-based approach. Training is at risk of becoming a 'tick box' exercise unless it well-aligned with meaningful values. Good training, delivered within the context of a strong integrity culture, presents opportunity for public servants to engage deeply, build understanding, and improve practice. The Integrity Champion network and JAIC forum also act as training and practice-sharing mechanisms. The refreshed Code of Conduct will also be accompanied by mandatory induction and ongoing training for all public servants. This will be an essential resource for agencies onboarding new staff and will ensure that people have a common understanding of expectations for public service behaviour.

Openness (organisational culture, speaking up/whistleblowing)

A culture of public service integrity is also supported by an open organisational culture, or a culture in which employees feel safe and supported to come forward with ethical dilemmas and integrity concerns. This is complemented by formal reporting mechanisms, such as whistleblowing and other internal disclosure policies.

Open organisational cultures are also supported by other features of the OECD Recommendation – for example, leaders who demonstrate a commitment to integrity and training of public servants to ensure understanding and adoption of principles, values, rules, and procedures.

In the New Zealand public service, chief executive induction sessions emphasise the importance of building a culture in which staff (and especially leadership teams) can raise concerns and trust that their concerns will be taken seriously. In terms of formal mechanisms, the Commission administers the Protected Disclosures (Protection of Whistleblowers) Act 2022. The Act facilitates the disclosure and investigation of serious wrongdoing in the workplace. The Commissioner has issued model standards for public sector organisations to support staff who speak up in relation to wrongdoing concerns that could damage the integrity of the public sector.

The Ombudsman has been experiencing historically high levels of complaints and protected disclosures over the past several years.[47] According to the 2024 TINZ assessment, the Ombudsman remains under-resourced, with long waiting times to address complaints.[48] Although the Ombudsman cannot always meet expected timeframes due to the volume of intake, they triage and prioritise all complaints, have received additional resourcing, and are making significant progress. They also have dedicated funding for protected disclosures and in 2024/25, they completed 83% of the 278 disclosures and enquiries they received within three months.

While most public servants know how to raise concerns about wrongdoing or inappropriate behaviour in the workplace, not all of them feel safe to use those processes.[49] Current activities to address this involve improving complaints management and speaking up processes and practices, for example through the development of a clear statement of complainants' rights. Through its integrity framework, the OAG has also provided guidance on creating a safe environment to raise and respond to integrity concerns.[50]

Accountability

The OECD Recommendation focuses on one function of the broader accountability system: accountability for safeguarding integrity. This involves managing, monitoring and scrutinising integrity commitments, as well as detecting, investigating and sanctioning integrity breaches. These activities form the 'compliance' side of an effective integrity approach, complementing those on the culture side.

Internal control and risk management

The OECD Recommendation suggests a risk-based approach to public integrity, which is based on understanding the main risks to integrity in a single sector, organisation or project. Risks are mitigated by improving control systems and building warning signals into critical processes. As an example, the Commission is working with the SFO and the Police on an Anti-Corruption Taskforce that is piloting initiatives to measure the nature and scale of public sector fraud and corruption (integrity risks) and assess system capability to address it (mitigation).

Participating agencies (Department of Corrections, Land Information New Zealand, Inland Revenue, ACC, Ministry of Social Development, and Sport New Zealand) will assess their fraud and corruption prevention and detection systems and report on their effectiveness. The Taskforce will then report back on findings and the pilot will "inform the government's future approach to counter-fraud and corruption capability across the state sector," including whether there are resourcing challenges that are acting as a barrier to stopping fraudulent activity.[51]

In New Zealand, public service agencies carry out their own internal audit and risk assurance functions and reporting required by the Public Finance Act 1989 and Public Service Act 2020. Other procedures carried out at agency level, but guided by model standards, include workforce assurance, conflict of interest reporting and management, and the declaration of benefits and expenses by chief executives of relevant public service agencies.

Government organisations must also manage security risks through mandatory protective security requirements, supported by best practice guidance. In recent years, the risks of foreign interference for public organisations have drawn increased attention, particularly insider threats (someone who can harm an organisation from within).[52] The cross-agency 'countering foreign interference' work programme, led by the Department of Prime Minister and Cabinet (DPMC), is the main vehicle for addressing these risks at a system level.

The Ministry of Education hosts the head of profession for internal audit, who is responsible for promoting the importance and expectations of internal audit and risk assurance functions. Internal audit functions provide embedded but independent (separate from management) assurance that standards, values and controls are working in practice. Their core purpose is to provide assurance to chief executives that integrity systems are effective and meet appropriate standards, and that systems are continuously improving. Specific activities include audits of procurement, conflicts of interest, delegations, complaints, business continuity, and information security. These foundational reviews are balanced with reviews of operational and strategic priorities.

The OAG and its business unit, Audit New Zealand, also have key roles in this area. Public entities are subject to audit, which assesses whether they have an effective internal control environment. Audit New Zealand provides guidance on best practice in risk management, probity management (integrity of procurement) and audit and risk committees, amongst other topics.[53] The OAG has also investigated how well agencies manage specific risks, such as cybersecurity risks.[54]

Oversight and enforcement

In the OECD framework, effective oversight involves:

- adequately responding to recommendations from external oversight bodies to demonstrate accountability and help organisations learn;
- effectively handling of complaints and allegations; and
- ensuring impartial enforcement of laws and regulations.

In New Zealand, key institutions check and oversee the decisions, actions and spending of public service agencies and public servants. These institutions are the Ombudsman, as a check on administrative power and the application of the Official Information Act, and the OAG, as a check on public sector performance and accountability. The judiciary (made up of judges and other officers) is another important check on executive decision-making. These three institutions, and the interactions between them, have been cited as strengths of New Zealand's integrity system.[55] Independent oversight is also provided in specific areas by dedicated agencies, such as the Inspector-General of Intelligence and Security (IGIS) and the Independent Police Conduct Authority (IPCA). These are focused on areas where the State has coercive powers. The recommendations of these oversight bodies are not binding, but their legislation allows for other mechanisms to strengthen accountability, such as the requirement for ministers to respond to reports (IGIS) and the ability to inform the Attorney-General and Minister of Police about unsatisfactory response to recommendations (IPCA).[56]

Enforcement provides the 'teeth' for a country's public integrity system and is the main way to ensure compliance. New Zealand public servants are subject to three main enforcement mechanisms in relation to integrity breaches. The first is disciplinary and based on the employment relationship with their public service agency. In this context, agencies are responsible for addressing individual public servant misconduct, such as breaches of the Code of Conduct, and may seek advice from the Commission on the interpretation and application of any relevant standards.

Second, the Commission investigates matters of integrity and conduct where public trust and confidence are at risk, especially relating to the actions and responsibilities of chief executives and/or that are relevant for the whole public service system. Breaches of integrity may also be subject to commissions of inquiry, including royal commissions for matters of the highest national significance (e.g. the recent Royal Commission of Inquiry into Abuse in Care).

Finally, there is criminal enforcement of integrity breaches that are also breaches of the law. The Police have a key role here, including a central role in enforcing anti-corruption law. Serious forms of fraud or corruption are passed to the SFO for enforcement. WorkSafe also has an enforcement role in the area of health and safety at work, which can extend to criminal prosecution.

Transparency and stakeholder engagement

Transparency and participation are closely intertwined with integrity and accountability. Transparency ensures citizens have access to the information needed for public scrutiny and can also introduce accountability by making it more difficult to justify unethical actions.[57] But transparency is most effective when it enhances public participation, empowering the public to engage with policy processes and ensure those processes are accountable and responsive to the public's needs.

Open government is a public service principle under section 12 of the Act. The concept promotes transparency, accountability and stakeholder/citizen participation[58] in support of democracy, trust and improved wellbeing. In New Zealand, open government is usually expressed as a general approach and attitude expected from the public service rather than specific actions.[59] Aspects of open government are included in other legislation, such as the Official Information Act 1982 (OIA), which promotes the openness and transparency of official information, the Privacy Act 1993, and the Public Records Act 2005. The Commission collects and publishes statistics on OIA performance in order to improve compliance and provide accountability. The Commission also works with the Ombudsman to improve agency capability to make more information publicly available, including through the OIA forum. The OIA forum helps build capability among OIA practitioners and allows those who are more experienced to share their knowledge with those who are new to the field. Open government is further supported by proactive release requirements for Cabinet material under the Cabinet Office circular (CO [23] 4) and accompanying advice.[60]

Active citizenship was discussed in the Commission's previous long-term insights briefing: *Enabling active citizenship: Public participation in government into the future*.[xiii] As discussed above in relation to a whole-of-society culture of integrity, examples of the Commission's stakeholder engagement include the Open Government Partnership, and the co-design of the Working with Survivors model standard. The Commission also helps lead the Cross-Government Stakeholder Community of Practice.

[xiii] Read the briefing in full at https://www.publicservice.govt.nz/publications/our-long-term-insights-briefings/our-first-long-term-insights-briefing.

Ngā Ia me ngā Kōkiritanga | Trends and Drivers

Public service integrity is highly influenced by context. Trends and changes in the public service, New Zealand, and the world are likely to change the context the public service works within. They might also change how the public sees the public service and what they expect it to deliver for them. Different types of service and different ways of delivering them will bring different integrity risks and opportunities, while any changes in norms and values will change what integrity needs to look like in practice.

Through our external engagements, internal workshops, and research, we have identified groups of signals, trends, and drivers that might impact public service integrity in 2040.

The trends are organised into categories: social, technological, economic and environmental, and political. Although they are discussed separately throughout this section, many of the trends are intertwined and have important interactions. Looking that them together reveals a different picture than each of them in isolation. At the end of this section, we think about how the trends might interact over the next 15 years to 2040, and explore what this would mean for public service integrity in three different 'outlooks' or stories.

Social trends

Social cohesion and trust

Shaky social cohesion (the 'glue' that holds people together) and sub-trends in levels of public trust have all been talked about recently in New Zealand.[61] Although New Zealand has been a cohesive, high-trust nation with a strong democracy in the past, global experience suggests increasing threats to this foundation. Events like the anti-vaccine mandate protest at Parliament show that there are challenges, as does data on how trust in public institutions is different between those who believe they have a voice and those who do not.[62]

While the Kiwis Count survey indicates that the public has high trust in public services based on their personal experiences,[63] data from the 2023 General Social Survey found New Zealanders' trust in key institutions (like the health system, parliament, and police) and trust in others fell since 2021, as New Zealand faced COVID-19 and other challenges.[64] Issues such as high income inequality, poor housing affordability, personal safety, the economy and climate change can put further pressure on social cohesion and institutional trust.[65]

In its 2024 report on drivers of trust in public institutions, the OECD provided data that complicates some of the existing preconceptions about New Zealand's 'high-trust' national culture. A strong national culture of integrity and high levels of trust in institutions (e.g. the public service) were thought to imply high levels of interpersonal trust between New Zealanders, but the survey found that New Zealand's interpersonal trust sits close to the OECD average and on the low end of the benchmarking group. New Zealand also has unusually high interpersonal trust for its high levels of cultural diversity.[66] This is something of an anomaly, given that research usually finds that low diversity is associated with higher interpersonal trust, which then contributes to high institutional trust. The OECD suggest that a history of effective and trustworthy public institutions have placed New Zealand in a high-trust position despite high diversity. In this context, institutional integrity failures are even more concerning, as they threaten what may be quite a precarious equilibrium.

Integrity is also a key driver of public trust. While having high integrity might mean an organisation is more trustworthy, the line between the trustworthiness of public institutions and public trust is not direct. The link is affected by many things including the economy, the media, and political differences, and investing in integrity might take time to be reflected in levels of trust.[67] Public trust is further complicated by the fact that members of the public have different understandings of the line between public institutions like the public service and elected officials.

Demographic change

New Zealand is headed for an overall older population, with older age brackets projected to increase in numbers and as a share of the overall population. The fertility rate is projected to stabilise below the replacement rate (2.1 births), after hitting a record low of 1.56 births in 2023. At the same time, all significant ethnic groups in New Zealand other than Europeans have faster population growth due to different birth and death rates. Māori, Asian, Pacific, Middle Eastern, Latin American and African ethnicities are projected to increase their proportion of the overall population. Although not reflected in Stats NZ data, the proportion of the New Zealand population with multi-ethnic identities is also expected to increase significantly.

There are also differences across regions driven by internal (within New Zealand) migration. This trend will see Auckland continue as New Zealand's most significant economic and population centre, with faster population growth and slower aging.

Migration settings are a big unknown in New Zealand's demographic population trends, as these are directly controlled by government and depend on other policy aims and settings. The built-in uncertainty of this was shown in migration trends during the COVID-19 pandemic, when a migration peak from mid-2019 suddenly dropped off with border closures in March 2020. These were the sharpest changes from the last two decades. Migration shows how population and demographic trends interact with other trends like unstable international politics and the impacts of climate change, as well as the ongoing impacts of COVID-19 and the possibility of future waves or new pandemics.

Migration trends might impact public service integrity through corruption risks and controls. International research shows that a high level of corruption discourages immigration (and international investment), especially impacting highly skilled workers.[68] Keeping low levels of corruption will be important if New Zealand wants more skilled workers as the working population ages. There has been suggestion that increased migration from high corruption countries may increase New Zealand's corruption risk.[69] But international research has found mixed effects of migration on corruption.[70] Recent evidence suggests that immigration from very corrupt countries increases corruption in the short run, but this disappears in the medium run.[71]

Changes in the makeup of New Zealand's population will also mean changes in the makeup of the public service workforce, with possibly older, more diverse, and more Auckland-based public servants who might face different integrity challenges.

These changes might also interact with other trends in ways that impact integrity. For example:

- an aging population would have more demand for services like superannuation and healthcare,
- a smaller working age population (depending on migration settings) would reduce the supply of workers and lead to less tax money for the government to spend on services,
- the public service workforce would also need to have a different makeup if it is important for public servants to reflect the communities they serve, and
- different regions across New Zealand might have even more different needs that will be harder for central government to meet.

In general, these trends might change what services the public wants, and this means public servants will need to think about how those services can be delivered with integrity.

Transnational and serious organised crime

Globally, transnational and serious organised crime is considered a growing threat to national and international security, with implications for public service integrity. While New Zealand doesn't have full data on transnational organised crime, there is evidence that its "scope, scale and impact is growing."[72] In recent years, New Zealand has seen more involvement of foreign organised crime groups in criminal activities in New Zealand, where they give access to global networks and are more willing to use tactics like intimidation and coercion.[73] The Ministerial Advisory Group on Transnational and Organised Crime has received reports from enforcement agencies that "a majority of significant interceptions of illicit drugs via our ports and airports" have involved "trusted insiders" among police officers, immigration officials, and private sector employees.[74]

Interactions with other trends mean that organised crime is likely to continue growing, "fuelled by climate change, geopolitical competition, poor governance and new technologies" on top of opportunities for significant profits.[75] As information-driven law enforcement and border protection activities become more effective, there will also be greater incentive for organised crime groups to corrupt public servants who can facilitate or protect criminal activities.[76]

Organised crime undermines community wellbeing, governance, economic development and national security[77] and is therefore likely to also have significant implications for public service integrity. Organised crime has many potential impacts on public sector corruption – from the bribery or coercion of frontline public servants at one end of the spectrum, to infiltration of senior leadership groups or the control of state policies and structures at the most extreme end.[78] International reports suggest that organised crime operations may eventually serve as de facto government actors, offering security and resources where the government falls short in its service delivery.[79] This would position them to dictate the norms in particular communities, supply chains or markets, posing a significant challenge to the integrity and ethics of the public service.[80] There is also some evidence that this may already be the case in parts of New Zealand, with gangs being "intricately woven within the fabric of communities" and evidence given in the Royal Commission of Inquiry into Abuse in Care that gangs provided social support and protection that was lacking from the state.[81]

Social media, public scrutiny and polarisation

There is also a group of trends around changes in the use of media and their impacts on the transparency of government. With more social media platforms available and more people using them, customers and the public are increasingly able to closely observe professionals, including public servants. This can have constructive impacts for the public service, increasing the availability of information and presenting opportunities for public participation.[82] It also increases opportunities to quickly spread negative events to a wider audience (for example, in the case of photos of a police officer wearing gang patches spreading on social media).[83] This potential for increased scrutiny may create heightened awareness of real and perceived integrity failures. A shift towards greater public accountability could either support or undermine institutional trust and integrity.

Along with increasing consumption of social media content, these channels can also facilitate the spread of mis- and disinformation, because they are not governed by fact checking standard like journalists are.[xiv] This problem is made worse by the 'bots' that automatically publish mis- and disinformation, and social media algorithms that promote content and reinforce echo chambers.[84] Mis- and disinformation have important integrity implications through their relationship to trust. Low trust has been identified as both a possible outcome and cause of misinformation,[85] which suggests that high integrity behaviour could help protect against misinformation.

Mis- and disinformation also interact with polarisation (the widening distance between viewpoints). When it becomes harder to determine whether or not something is true, people are forced to rely on their perceptions and this can erode a shared acceptance of reality.[86] Marginalised communities that already have trust deficits are especially vulnerable to misinformation and disinformation.

[xiv] Misinformation and disinformation refer to pieces of information that relate to disprovable facts – they can be shown to be incorrect. Misinformation is false or inaccurate information, while disinformation is intentional misinformation. A piece of information cannot be mis- or disinformation if it is a matter of opinion.

New Zealand is vulnerable to the same challenges of polarisation shared by many democracies around the world, which can be exacerbated by other trends like increased inequality and foreign interference in New Zealand's affairs. In the future, if it becomes harder for people to find common ground on social and political issues, strong institutions and processes to protect the public interest will be even more important. In this context, public servants will need the skills to run public engagements that stay fair and balanced, acknowledging the range of different viewpoints held by members of the public but without being too swayed by those who have strongly held beliefs.

The rise of social media is continuing to seriously impact the role of traditional news media, which is struggling to stay profitable. In a high-choice media environment, many people increasingly receive their news content from social media, encouraged by populist and authoritarian movements that devalue the expertise of professional journalists.[87] The 2023 US presidential election highlighted the growing power of this alternative news ecosystem, which includes politically biased creators that often operate outside journalistic norms. Some people suggest alternative media now has more influence and is more trusted than the mainstream media.[88]

This trend is important for public service integrity because it challenges the ability of journalists to fulfil their role in upholding the transparency and accountability of government actions. This can happen because of commercial pressures that push the media to be less confrontational or to not check facts, or because journalists' stories are pushed out by content created for social media and answers generated by AI that look like news stories.

Online misinformation can also undermine public trust in mainstream media outlets,[89] weakening their important integrity role in holding government accountable by uncovering and reporting on corruption.[90]

Disinformation shared by AI-enabled deepfakes is also emerging as a problem with new challenges for public service integrity. AI tools could be used to create increasingly convincing fake videos of public servants taking bribes or not behaving with integrity.[91] As well as the potential for negative impacts on public perceptions of integrity, deepfakes could also impact oversight and enforcement, making it more difficult to identify real integrity breaches and placing additional strain on oversight agencies.

Technological trends

AI opportunities in the public service

The increasing use of AI in the public service is already an established trend, with the Government Chief Digital Officer leading a work programme for safe and responsible uptake that includes a common framework and guidance.[92] Current uses include:

- management of infrastructure use and maintenance,
- forecasting and planning,
- analysis of large datasets,
- special applications that support information and logistics,
- sharing information with the public through chatbots or other AI assistants,
- providing a 'natural language' interface for any system, and
- reviewing and categorising applications and reviews, especially those that are highly rule-based.

Possible uses in the future, as the technology develops and improves, include digital twins (for example, of cities) that enable sophisticated modelling to see how real systems would react to different scenarios, and public service use of autonomous vehicles (for example, for fire and emergency response).[93] Through these uses, AI can deliver benefits such as increased productivity and reduced human error, better transparency and responsiveness to the public, more consistent decision-making, and stronger accountability through support of independent oversight institutions.[94]

One of the ways that AI (particularly large language models and machine learning) can be useful to the public service is for preventing and detecting integrity issues. AI can deliver improved efficiency and help analyse unstructured data, allowing agencies to meet their integrity responsibilities more effectively.[95] In relation to anti-fraud and anti-corruption activities, AI's ability to organise large volumes of information and to identify patterns and anomalies presents significant opportunities for monitoring, auditing and detecting corruption.[96]

Importantly, the use of AI in the public service will be part of broader digital transformations, which themselves introduce opportunities and risks for public service integrity. For example, automating government processes can reduce the risks of bribery and other corrupt behaviours (e.g. falsifying invoices).[97] The productivity and efficiency gains of AI may also free up time for public servants to work through complex ethical decisions.

AI integrity risks

Despite lots of talk about how AI will improve the way things work across the public and private sectors, there are unique challenges for the public service in realising this potential. AI and the package of technologies it includes pose risks for service quality and equity as well as more specific integrity issues.[98] These integrity issues include "amplification of bias, the lack of transparency in system design, and breaches in data privacy and security."[99] Some of these risks are heightened in New Zealand, where Māori and Pacific peoples are even less likely to be represented in international AI training data sets.

There are already examples of problems that come from using algorithms and automated decision making. These include racial bias in facial recognition technology used for crime prediction, and several cases in welfare systems with automated calculation of entitlements (e.g. the Toeslagenaffaire child benefit scandal in the Netherlands and Social Card law in Serbia).[100] Another high-profile example is Robodebt in Australia (see Appendix 4). The Royal Commission into the Robodebt Scheme found that the "automation used in the Scheme at its outset, removing the human element, was a key factor in the harm it did."[101] This occurred in a context of integrity weaknesses, such as a resistance to outside perspectives, over-responsiveness to ministers, and a public service culture that discouraged speaking up.[102] These examples highlight the importance of a strong integrity culture (such as the ability to raise and listen to integrity concerns) in agencies that are using algorithmic tools.

In light of these cases, the rise of 'algorithmic accountability' in the public sector tries to set accountability for people or organisations that create, buy, and use algorithms for public services.[103] Another movement, for algorithmic transparency, focuses on rebalancing the control that the private sector has over critical information about the ethical, legal, political, and technological implications of AI.[104] Without addressing this, the operations of AI remain hard to understand and regulate. This is even more of a risk given that AI development and its adoption may move faster than New Zealand's governance arrangements, making it harder to address problems as they come up.

One of the key considerations for integrity in public service use of AI is what role human decision makers play in processes that also include AI. Self-learning algorithms have been shown to increase the risk of biased decision making or reduce accountability because it's harder to challenge decisions when there was no human decision-maker in the loop. Currently AI is used by and alongside human decision-makers, but this might shift toward AI working more and more autonomously, without human involvement. Human involvement may also not be an adequate safeguard on its own, due to issues like automation bias (a tendency to 'over-trust' automated systems).

Being aware of these risks now will ensure that New Zealand is prepared to address them as AI uptake continues. A range of sources have already developed frameworks of responsible AI principles that, if implemented, will mitigate many of the AI risks discussed here.

Internationally, the OECD have a set of values-based principles that are intended to keep the use of AI aligned with goals for sustainable development and human rights, as well as with basic integrity standards like transparency and accountability.[105] Tech companies like Microsoft are also adopting principles for AI use.[106] In New Zealand's public service, we have principles from the GCDO AI framework mentioned above, as well as the longer-standing Algorithm Charter.[107] These frameworks and principles highlight the importance of foundational ethical behaviour – getting integrity essentials right will serve New Zealand well throughout the adoption of any new technology. There is an importance balance between slowing down to ensure privacy and integrity are protected and meeting pressures to seize opportunities faster and reduce costs. The use and protection of data, discussed in the next section, is a key element of this.

Cybersecurity, privacy and data

Concerns around cybersecurity and privacy are well established in the public service, but trends around AI and other digital transformations like the use of cloud storage are increasing these concerns. The use of AI in cyberattacks falls at the far end of integrity issues with AI covered earlier.[108] How data are stored and shared are essential questions for mitigating cybersecurity and information risks.

The National Cyber Security Centre's 2023/24 *Cyber Threat Report* indicates that New Zealand is facing increasingly complex threats to cybersecurity. These come from both criminals and other countries, as "geopolitical tensions, conflict and an economic downturn have resulted in a more adversarial global cyber environment."[109]

The 2023 *National Security Long-Term Insights Briefing* predicted an increase in the use of cyber-attacks over the next 10 to 15 years to support other activities that will affect national security – and public service integrity – such as disinformation and misinformation, foreign interference and transnational organised crime.[110] Cybersecurity threats are not only external but also include information leaks or privacy breaches by people working in public organisations. These can be people who intend cause harm, are pressured by someone else, or have poor security awareness. With more public data captured digitally, there are more opportunities for integrity breaches, either through poor handling of information, or through deliberate acts – like in the leak of Te Whatu Ora vaccine-related information.[111]

The Privacy Survey run by the Privacy Commissioner found in 2024 that the percentage of people who were "more concerned" about privacy issues had increased 14% since the previous year.[112] The COVID-19 pandemic saw more data collected for public health purposes and this has resulted in concerns about privacy and the increased threat of data breaches through cyber-attacks. Information was collected quickly, in unprecedented quantities, with the security in place often not fit for purpose.

Recent inquiry findings into the protection of personal information identified scope to further develop New Zealand's current approach, especially where core public service agencies were working with contracted organisations.[113] The involvement of third-party (non-government) service providers and their use of the personal information held by government is becoming an area of more interest and concern. Following the results of the inquiry, the Government Chief Digital Officer released a mandatory 'Standard for providing non-government third parties with access to, or collection of, government-held personal information'.[114]

Concerns around the collection, use and management of data and information also have implications for accountability and institutional credibility. Poor recordkeeping can create challenges for accountability and undermine public service integrity, as highlighted in the report of the Royal Commission of Inquiry into Abuse in Care. The most recent assessment of the state of government recordkeeping in New Zealand found most government organisations are failing to meet the Chief Archivist's expectations for good recordkeeping.[115]

Internationally, we have seen increasing concerns about government statistical systems, including falling survey response rates in many countries, cuts to data collections in the US,[116] and "deep-seated" data quality problems in the UK.[117] In New Zealand, challenges to the traditional Census model have included declining response rates and increasing costs. These challenges suggest that upholding professional standards and practices for data and records – for instance, agencies ensuring that data is used ethically and transparently – will be important both in terms of effective public service delivery and in maintaining public trust.

A move towards thinking about information and digital systems as 'Digital Public Infrastructure' (DPI) suggests ensuring that digital infrastructure administered by the public service is actually serving the public interest and promotes security. Examples of commonly recognised DPI include digital identification (like RealMe), payment systems, and data exchange systems, while sector-specific examples are also emerging.[118] When developed and implemented well, these systems support public service integrity by reducing opportunities for integrity breaches though better data protection and reduced oversharing.

Modern digital identity services give members of the public greater control over their personal information, ensuring that government and other service providers only access the relevant pieces of information rather than a whole packet of data.[119] Similarly, digital payment systems can reduce corruption (e.g. in India).[120] The Reserve Bank of New Zealand is thinking about how New Zealand's monetary system might need to change to meet future challenges, including our payment systems and the possibility of 'digital cash.'[121]

Economic and environmental trends

Economic and fiscal context

The public service's work and integrity may be influenced by the fiscal context, which in turn is influenced by the broader economic context.

Treasury considers that New Zealand has a challenging medium-term fiscal outlook, with high government debt and operating deficits driven by the need to respond to a series of significant crises.[122] Poor conditions in the national economy have been resulting in lower tax take and therefore lower Crown revenue. Ongoing low productivity, driven by low innovation, investment and international trade, is also contributing to low economic growth.[123] Decisions to constrain budget operating allowances mean that fiscal conditions are forecast to return to surplus in 2028/29.[124] In the broader economic context, growth is slow globally as well as in New Zealand due to the costs of geopolitical instability and the ongoing impacts of COVID-19.[125]

In the longer-term, integrity risks may be amplified by New Zealand's exposure to shocks as well as the impacts of other trends like an aging population, climate change, geopolitical tensions, health costs and technological change.[126] These trends and shocks could then put further pressure on our public services.

Pressures on the public service to cut costs and/or operate more efficiently are known to put strain on integrity, with the risk that proper process can look like a good corner to cut. This behaviour risks damaging the trust and confidence of sectors which work closely with government, such as social service providers, as well as the wider public. Pressures on agencies to make savings by reducing costs have been identified as contributing factors in public sector reviews of integrity failures (e.g. Robodebt in Australia).

At the individual level, these pressures increase the risk of insider threat from deliberate acts (such as leaks) by unhappy employees, or neglect by employees under stress. Growing workforce insecurity can damage loyalty, professionalism and a sense of shared pride. Constrained resources might also reduce investment in activities to build integrity, as agencies have to reprioritise. This highlights the importance of careful management of cost-cutting initiatives to ensure a focus on integrity is maintained throughout.

Inequality

Another key dimension of the economic outlook in relation to the public service and its integrity is the state of inequality. Locally, regionally, and internationally, inequality is growing and has been for decades.[127] Between 1980 and 2020, income inequality rose in most advanced economies and major emerging economies, which together represent about two-thirds of the world's population and 85 percent of global GDP.[128]

Increasing global wealth inequality is seen as a significant challenge, especially due to its "potentially negative consequences such as elite capture and social unrest".[129] Rising inequality has been linked to other trends such as declining political trust[130] and challenges to social cohesion. Higher socio-economic inequality may also undermine civic engagement,[131] which otherwise contributes to a strong public integrity system.

In New Zealand, wealth inequality is even more severe than income inequality, with the top 10% of households holding roughly 50% of total household net worth.[132] The current high levels of inequality are likely to continue or even rise further, based on evidence of no significant change in the distribution of wealth across New Zealand households between 2015 and 2021.[133] As with the link between fiscal pressures and integrity issues, research has shown that societal inequality is linked to corruption, where inequality tends to support social tolerance of corruption, allowing it to grow.[134]

Climate change

Over the next few years to 2040, every part of the world is expected to face more climate hazards and related risks, including extreme weather events and biodiversity loss. There will be increasingly complex and cascading interactions between climate- and non-climactic risks, such as pandemics and conflict.[135]

In New Zealand, climate change is expected to worsen or create new risks for our natural and built environment, economy and communities.[136] Natural disasters happening more often and with worse impacts will likely affect fiscal conditions as well as potentially changing the types of services the public expects to receive from government (e.g. greater demand for disaster recovery and relief, which has typically been delivered through local government). Natural disasters and other shocks such as pandemics may heighten integrity risks, such as the risk of corruption in public procurement (goods and service bought by the government).[137]

The scale and size of the climate change response will require working with a range of actors, including the private sector, in an area of difficult trade-offs and competing interests. This could intensify existing risks for public integrity, such as conflicts of interest and illegitimate lobbying practices, reducing the ability of public officials to act in the public interest.[138] The transparency and stakeholder engagement parts of integrity will also be important, as central government and local authorities will need to engage with communities effectively to ensure successful climate change adaptation.[139]

Political trends

Democratic resilience

Trends in the health of democratic institutions and values cover a range of issues, including shifts in political participation, lowering trust in political institutions, and the global rise of populism[xv] and polarisation. Democracies are also trying to deal with external challenges, including climate change, disinformation and rapid technological change.

Although New Zealand is ranked highly for the strength of its democracy in international measures, assessments have highlighted challenges such as socio-economic inequalities, a shrinking media industry and low civic engagement.[140]

Globally, there has been a decline in trust in representative institutions,[141] and increasing suspicion towards democracy as a political system.[142] In developed democracies, citizen claims of 'corruption' in political systems do not always mean street-level corruption, such as bribe-taking. Instead, these claims may reflect views that political systems respond more to the wealthy, or a general unhappiness with politics.[143] As suggested through consultation on this briefing, these views may also reflect pockets of concern that sector and stakeholder engagements go beyond community participation to soft corruption, allowing some to exert disproportionate influence through an 'inside track'. Transparency International New Zealand suggest a lack of confidence in how political parties and politicians operate, and political integrity scandals, may be contributing to disappointment with government more generally in New Zealand.[144]

Concerns about a global retreat from democracy have also grown, with democratic performance found to be getting worse even in established democracies.[145] In recent years, new, more subtle forms of 'democratic backsliding' have emerged, where governments undermine democracy from within by weakening or removing the checks and balances that sustain democracy.[146] According to the World Justice Project Rule of Law Index, checks on government power declined in 59% of countries between 2023 and 2024.[147]

[xv] Definitions of populism vary, but common elements include anti-elitist, anti-establishment, anti-political, and anti-pluralist views, each of which can conflict with democratic values and institutions.

'Backsliding' strategies include gaining the loyalty of public servants, or attacking and sidelining them.[148] This democratic backsliding can create ethical conflicts for public servants between loyalty to the government of the day and carrying out policies that undermine democratic institutions.[149]

A rise of populist politics both in advanced and emerging economies can contribute to this democratic backsliding. The number of countries with populists in power reached a historical peak in 2018 and has remained close to this level.[150] Through the anti-elitist and anti-pluralist lens of populism, democratic institutions are part of 'the establishment' run by elites who are not responsive to 'the people' and are therefore suspect.[151] On their own, criticisms of the responsiveness of institutions to the public are not necessarily populist and can be calls for greater accountability that would strengthen democracy. But research shows that the democratic risks of populism instead come when populist language is blended with authoritarian values.[152] Populists often use the narrative of a corrupt elite to mobilise voters, building off public discontent and demands for accountability,[153] but once elected they have in some cases been found to remove accountability mechanisms and other checks on their executive power, allowing further corruption.[154]

A 2024 survey of populist views revealed "a pervasive sense of societal and economic decline among New Zealanders," lining up with international findings, and 54% of respondents agreed that New Zealand needs a "strong leader willing to break the rules."[155] A majority of New Zealand respondents also agreed that "traditional parties and politicians don't care about people like me" and "experts in this country don't understand the lives of people like me."[156]

Historically, New Zealand has been through cycles of democratic reform and renewal,[157] and how these trends influence New Zealand's integrity challenges out to 2040 will depend in part on how government and others respond. In some countries, concerns about the state of democracy have led to recent civil society or government initiatives to strengthen democratic institutions, such as Australia's Strengthening Democracy Taskforce.[158]

Politicisation

The potential for politicisation of the public service is an issue which has drawn attention both internationally and in New Zealand, and was a key concern of submitters in the consultation for this briefing. Within a broader international trend of increasing politicisation, politicisation has taken different forms in different countries and styles of government.[159] In 'Westminster' systems like New Zealand, politicisation is typically used in a negative sense, to refer to threats to the independence and impartiality of the public service such as the sidelining (or self-censorship) of free and frank advice.

A distinctive form of 'incremental' (slow) politicisation has been identified in Australia, New Zealand, Canada and the UK, with New Zealand described as the least politicised of this group.[160] Examples of incremental politicisation in these countries include a growing number of ministerial advisers and more political influence over senior appointments. Local analysis of politicisation in New Zealand has drawn attention to its more subtle forms, including politically responsive behaviour by public servants.[161]

There have been ongoing concerns that the free and frank advice convention in New Zealand's public service is getting weaker, and that appointments to public boards are not always seen to be based on merit.[162] Surveys of public servants on the health of the free and frank advice convention have produced mixed findings.[163] In the 2025 Public Service Census, of those who were involved in preparing advice to ministers, 71% were confident that their organisation was free and frank in that advice. Public servants who are seen to have breached political neutrality have also drawn recent media and select committee attention,[164] and leaking of information has become a high-profile issue.[165]

International developments highlight where increasing politicisation can be challenging for public service integrity. In Australia, the politicisation of the public service has been connected to a major integrity failure, Robodebt, showing the risks of being too responsive to ministers and losing public service capability.[166] This is especially challenging when it coincides with a disinterest in evidence-based policy and in receiving the free and frank advice of the public service.

In some countries, overlapping with populism, politicisation has put pressure on norms and values like the neutrality of the public service, appointment on merit, and the independence of integrity watchdogs.[167] As a consequence, public servants may increasingly feel that their beliefs and values are in tension with their professional roles. This could lead to active resistance through 'guerilla behaviour' motivated by disagreement with political agendas.[168]

In other cases, public servants may want to raise issues that are part of broader ethical frameworks (e.g. human rights, personal identity, and climate change) but not part of the current political platform (especially populist platforms). This raises questions about how to balance different public service duties of loyalty (e.g. to international obligations, institutional values, and the government of the day).[169]

Geopolitical

The international system of rules and institutions established following World War II is giving way to a more contested global environment, characterised by strategic competition between a growing number of countries and the undermining and reshaping of global rules and norms. The period of relative stability, integration and growth that followed the Cold War has been shifting over the last decade, towards increasing contestation across military, economic, technology and information domains. Multilateralism is under increasing strain, with diminishing global leadership.

Alongside declining multilateral cooperation amongst nation states, corporations (e.g. in the technology space) are increasing their international monopolies and becoming more difficult for single nations to regulate.[170] As their influence spreads into the public sphere, they may increasingly become possible partners for service delivery and other government activities (e.g. through GovTech or in pandemics).[171] Their ongoing power is likely to have implications for public integrity (e.g. corruption, lobbying, provider capture, cybersecurity and data sovereignty, transparency).

Although New Zealand has developed its own approach to public service integrity, it also participates in the international integrity ecosystem, for example through the UN Convention Against Corruption and the OECD Recommendation on Public Integrity. By 2040, multilateral institutions that have provided frameworks for collective action, including on integrity matters, may see their influence decline, and there may be fewer opportunities for dialogue and cooperation on strengthening public integrity.

Increased instability in the geopolitical landscape also has the potential to amplify existing integrity risks, such as an increase in foreign interference operations targeting the public sector and putting the public interest at risk. As security gets more important, it will be important to make sure integrity stays central in key areas like the use of state surveillance or government adoption of emerging technologies.

What could these trends mean for public service integrity in the future?

Many of these trends have potentially interacting effects on the future of public service integrity. Some trends, like climate change, could affect fiscal and economic conditions, which are key indicators for integrity risks. Similarly, several trends have possible impacts for public trust in institutions, and for the role and functions of the public service. Changes in these areas might lead to different integrity risks. Or they could change the basic values of society that affect how integrity is defined, which would then change what integrity should look like in a public service context.

To help us think about how these trends might collectively affect the future of public service integrity challenges, we outline three outlooks – possible views of the future. These are not predictions. Instead, they show some of the ways that public service integrity challenges could change and interact by 2040. The first versions of the outlooks were based on our research into trends, and then were built on in internal workshops where participants imagined how these trends may interact and develop over time.

The boiling frog

At the geopolitical level, tensions between states are increasing and there is declining cooperation on global issues such as trade and climate change. Resource scarcity and migration pressures are growing, creating new opportunities for corruption and transnational organised crime. International cooperation to reduce corruption and strengthen integrity systems are less important for government. Instead, states take an inward focus on protecting their own security and economic interests. Mishandling of citizen data and exploitation of cyber vulnerabilities are a growing concern as more government processes are automated and AI-driven decision-making becomes more common. Social cohesion is under increased strain, in part due to the disruptive effects of technological change. Common ground is harder to find, including on public service integrity issues, in the context of an increasingly polarised media landscape and more widespread disinformation. Creeping politicisation advances, creating more tensions around public service principles, conventions and practice.

Integrity in freefall

Pressures on public services accelerate against a backdrop of widespread inter-state conflict, major disruption to international trade and climate-related extreme weather events. Socio-economic inequalities are widening, made worse by unaddressed climate change and new waves of digital technologies and automation. AI has rapidly reshaped the labour market, leading to societal upheaval. Transnational organised crime has grown rapidly in scale and impact, with New Zealand seen as an easy target due to its carelessness in addressing corruption. Vulnerability to public service integrity breaches is increasing as governments seek quick results in a context of fiscal constraint. Major failures in the handling of sensitive information become more frequent, damaging public trust. Large parts of the population feel disempowered and marginalised, fuelling the popularity of extreme political groups and movements. Drawing on public mistrust of institutions, some political actors use the language of anti-corruption to attack the public service, but reduce oversight and transparency once elected. A lack of coordination between integrity actors and a lack of resources weaken oversight and enforcement, meaning the public interest is increasingly at risk. Reacting to integrity crises draws attention away from long-term investment in building public service integrity. In turn, high-profile crises become more frequent as cultures of integrity weaken. New Zealand is no longer renowned for our high integrity public service, as other countries leapfrog us in strengthening their integrity systems.

Integrity at the centre

Despite geopolitical tensions, countries work together to address global challenges and contribute to multilateral efforts to counter corruption and integrity risks. In New Zealand, technological innovation, a vibrant civil society and strengthened public participation increases the transparency of public decision-making processes and the responsiveness of policies and services. Integrity actors work with a diverse range of civil society groups and the public on an even better public integrity system, which then boosts public trust and confidence. The private sector takes a larger role in the conversation on the importance of public service integrity, and the public has increased understanding of public service integrity and integrity challenges. Technology is used to deliver public services in more effective ways, and to support anti-corruption efforts, with ethical risks carefully managed. Integrity is right at the centre of all public service agencies' work, as it is considered an important part of their performance. A strategic and coordinated approach supports a strong culture of integrity in the public service, which holds the trust and confidence of New Zealanders and maintains its international reputation for integrity and effectiveness.

Te Anamata e Wawatatia ana me ngā Kōwhiringa e Eke Panuku ai | Desired Future State and Options to Get There

This briefing has so far explored trends expected to affect New Zealand's public service integrity challenges over the next 10 to 15 years, and our current approach. This section turns to how we can strengthen the current approach to reach desired long-term outcomes. Key considerations for reaching these goals are in striking the right balance between a values-based and compliance-based strategic approach, reinforced by the appropriate standards, monitoring, and consequences.

Within the framework of the Public Service Act 2020, our integrity work is intended to support the long-term outcomes of a public service that:

- has a strong and unified culture of integrity
- is responsive, politically neutral, and offers free and frank advice to the government of the day
- holds the trust and confidence of New Zealanders
- improves its performance and reduces costs (especially costs of enforcement and 'putting things right')
- maintains its international reputation for integrity and effectiveness

Based on the OECD Recommendation, the success of such an approach needs to also consider the roles of the legislature (Parliament) and judiciary (judges and the courts) as well as individuals and the private sector. The state of integrity across the whole of society has a significant bearing on integrity in the public service and government as it is perceived by citizens. The culture, behaviours and actions of the public service can influence other sectors and branches of government to some extent, but these other sectors and branches are not the focus of this briefing.

Options for achieving our desired future state are outlined below, grouped under the three pillars of the OECD Recommendation. The main activity of each option is indicated in bold text. These are high-level options that have come through our research and consultation – the purpose of the long-term insights briefing is not to conduct thorough and detailed analysis of the costs and benefits of these options. Any promising options would still need to go through a proper policy process.

System

Responsibilities

Options here relate to the structure of the broader public integrity system and how responsibilities are allocated. These options focus on addressing challenges such as fragmentation and doubling up, as well as improving collaboration between agencies with overlapping mandates.

The **creation of a single anti-corruption agency** is a structural option that has been taken up by other countries – most recently, Australia – and has also been suggested by Transparency International New Zealand (TINZ) to take on centralised responsibility and resourcing for anti-corruption monitoring, coordination, research, and strategic operations. Having such an agency would arguably give greater visibility to anti-corruption work and reduce some coordination challenges in the system, but it would also be expensive and complex. It might also require work to review and strengthen the regulatory framework that such an agency would uphold, given the issues that these agencies work on in other jurisdictions (e.g. lobbying, interests and political donations).

The pros and cons of a single-agency anti-corruption approach versus a multi-agency approach are part of an ongoing debate, and so far, the international evidence appears mixed on the performance of dedicated anti-corruption agencies compared to more decentralised options.

The reporting of integrity issues is an area that would particularly benefit from a focus on coordination, as there is a risk of issues falling through the cracks if they don't meet the explicit thresholds for consideration by any particular agency. This aligns with the option to implement a **'no wrong door' reporting approach** that would capture integrity issues regardless of how and where they were raised (discussed later with options in the dimension of 'openness').

A softer alternative to structural changes that would still give an indication of strong commitment to strengthening integrity would be for **the Commission to provide stronger and more visible leadership on integrity issues**. This could take several different forms, but all would likely have resourcing considerations. One angle would be to take an expanded education and training role, leaning more on the visibility element and developing that visibility for both public servants and the wider public.

Another element of visibility and leadership would be to communicate the structure of roles and responsibilities within the system, which would be particularly valuable for the public. This might be tied to leading some form of public service integrity strategy and coordinating work across other agencies with specific expertise. Communicating clearly about what the players in the system do and where to go to get more information or raise concerns would help with any navigation issues among both the public and other agencies.

The point about visible leadership could equally apply to any or all of the other agencies involved in the integrity system. Indeed, it would likely be more effective if it involved **collaborative and coordinated leadership**, bringing together the various agencies of the integrity system into an 'integrity sector' similar to the justice sector or natural resources sector. This briefing has gone some way towards building a clear picture of what the system looks like. We have found that although it does include a range of different agencies, progress is already being made on ensuring that these agencies are working together closely and effectively and this would be worth continuing.

The need for leadership of the integrity system to be collaborative is highlighted by the fact that the key players span different branches of government, with the Office of the Auditor-General (OAG) and Ombudsman's positions in the legislative branch of government intentionally putting them beyond the direct leadership of the Commission. It would therefore be more likely that the Commission could take a stronger role within the public service while collaborating more closely with the independent bodies to ensure a shared understanding of context.

Greater coordination and alignment could also help minimise overlaps in existing standards and expectations and maximise the benefits of existing frameworks that overlap with integrity considerations (e.g. protective security requirements). This would free agencies up to invest in integrity performance, rather than in meeting overlapping compliance and reporting requirements. This also relates to options for a comprehensive strategy and streamlining of data, discussed in the following section.

Strategy and measurement

This is a broad-ranging category of options that emphasises the value of not just having a strategy but also of the process to develop it. As a policy option, the development of an evidence-based strategic approach for reducing public integrity risks is a key recommendation from the OECD, while TINZ advocates for a coordinated strategy focused specifically on anti-corruption activity and that takes a risk-based approach.

TINZ's risk-based approach involves looking at areas of greater risk – public service activities that have the potential to give rewards (either financial or power/influence), such as procurement, borders (customs and immigration), data management, financial infrastructure, investigation and prosecution, social cohesion, defence and security, local government and environmental protection. The OAG audit of the Commission's integrity work also notes the importance of understanding vulnerabilities and risks specific to individual organisations or sectors, supported by more systematic data collection and analysis.[172]

The **development and execution of a comprehensive strategy for public service integrity** in New Zealand would likely gather up a range of different policy options in different areas, with the aim of building support and improving consistency. It could align with a system mapping exercise, where identifying separate responsibilities would likely also involve some level of agreement between the key players on how they will work together towards a set of collective priorities.

For a strategy to have lasting value, it would likely require strong buy-in from the government of the day. In other countries, this level of buy-in has often required some sort of crisis that then gives a 'burning platform' for change. Alongside the devastating systemic failings highlighted by the Royal Commission of Inquiry into Abuse in Care (which is already resulting in changes to oversight and bespoke integrity measures for the care system), New Zealand's platform for change is also evident in a build-up of smaller issues that could be described as a crisis of complacency.

High quality measurement would be an important part of a successful integrity strategy, and help address some of the shortcomings of relying solely on perception measures. Benchmarks and indicators would allow the public service to set measurable goals. Making better use of data and improving integrity monitoring and reporting are also two key recommendations from the OAG's recent audit of the Commission's integrity work.[173] Given the importance of this option for underpinning much of the work for other options, **strengthening and increasing our measurement of integrity indicators** would need further work to determine the specifics of what measurement will be the most meaningful and useful.

Such an approach would have resourcing implications, but there may be some less intensive approaches that involve grouping and aggregating existing measurements. For example, there are protective security, privacy, procurement, and Official Information Act performance requirements that involve assessments of agency capability or compliance and that are not always publicly available or shared with the Commission.

At the individual agency level, this data could also be built out with data from Performance Improvement Reviews to give a more complete picture. There may also be an opportunity to **streamline and reduce duplication in this data** (which would involve lead agencies working together to reduce the reporting burden on agencies). Other options raised throughout this section might also generate more data that could be brought together to help measure our progress on integrity and set measurable aspirations (e.g. declarations from chief executives to attest that they and their staff have completed integrity training, discussed in the workforce capability section below).

Established risk and audit functions within agencies might also be able to **audit integrity performance**, provided there were established outcome measures for them to check against. For example, the Commission's model standards could be associated with an outcome measure such as 'have your personnel completed the required integrity training?', or agencies could be required to report against measures developed for *He Aratohu* – the package of integrity standards and guidance. The challenge for developing meaningful measurements along these lines is to ensure that reporting does not become a compliance exercise that undermines the inherent value of robust integrity practices.

Overseas jurisdictions offer some examples of **integrity maturity self-assessments** undertaken by agencies. Along with general agency annual reporting and work being undertaken through the Anti-Corruption Taskforce, requiring these and collating them into a system view would improve our understanding of the state of integrity practice across the public service.

Measuring the quality and impact of activity carried out as part of an integrity strategy is also important for knowing whether the strategy is working. While this can be complex and challenging, there is some guidance for how to measure the effectiveness of strategies and related activities.[174]

The Public Service Census – Te Taunaki – is another avenue that could be built on to increase our pool of credible and relevant data on the effectiveness of the public integrity system. There are questions in the Census that relate to the public service principles and broader integrity culture, including whether managers are leading by example in ethical behaviour, as well as bullying and harassment. Other jurisdictions run their equivalent of the Census on a yearly basis, but our programme has not yet settled on a rhythm, with surveys running in 2021, 2025, and the next one set for 2027. It might be possible for **shorter, integrity-focused surveys** to be run by agencies or for the Commission to collect information in non-Census years. These surveys could provide insights into specific matters and help inform other options identified in this section or trends identified earlier in this briefing.

For example, it may be helpful to understand how polarisation affects public servants in their work, or how well agencies are creating psychologically safe workplaces and reducing bullying. It may also be helpful to **broaden the coverage of the Census to include Crown entities**, whose participation is currently on an opt-in basis with a cost to them. This would provide a deeper understanding of integrity across agencies directly responsible for a significant proportion of government expenditure and service delivery.

Another consideration for agency measurement and reporting is the possibility of **making agency integrity performance public** to encourage improvements, or sharing internally with agencies given a 'RAG' (red/amber/green) rating. In South Korea, publishing and comparing different public organisations based on integrity and anti-corruption indicators has created competition and encouraged low performers to improve.[175] However, this kind of approach may also drive unintended consequences like gaming.

Standards

New Zealand's approach to public service integrity is already strongly grounded in the use of standards (e.g. the Code of Conduct and model standards). In the New Zealand system, standards are designed as an expression of minimum expectations and are intended to lift practice and improve consistency in relation to specific topics and matters. Options in this section are mainly centred around considering what topics are covered by standards.

In the core public service, work is already underway to **issue an updated Code of Conduct**, so the more meaningful options are focused on how the Commission **promotes the standards** and integrates them into education and training that brings them to life and makes them part of public servants' day-to-day decision-making. There is also value (as covered in the openness section) in ensuring that public service values and standards are communicated both internally to public service organisations and externally to the private sector, civil society and individuals.

Given that standards are a tool that can be used to address a range of different issues, there are also options around some of those **specific standards** that are intended to help prevent integrity breaches and build good practice, such as **political neutrality**, **conflict-of-interest management** (including interests and assets registers, and 'revolving door' practices), and **gifts, expenses and sensitive expenditure**. TINZ have recommended extending the application of such standards to cover public office holders in all branches of government.

There may also be opportunity for a renewed focus on certain standards in light of new or ongoing issues – for example, a focus on the positive and safe workplaces model standard in order to reduce bullying, the most common perceived integrity breach in surveys of New Zealand public servants. Political neutrality might also be an appropriate area of focus, given the range of interrelated trends in this area and the importance of affirming public servants' access to their civil rights like freedom of speech and political expression.

The topic of **free and frank advice** is interesting to consider here, because it is a principle for the public service to follow but it also interacts with conventions in the political executive (ministers). TINZ have suggested a review of the respective responsibilities between Cabinet/ministers and public servants in this regard, which might present opportunities to build on the Commission's guidance on free and frank advice and policy stewardship and extend training to ministers.[176]

Setting a standard for revolving door practices that outlines clear processes and expectations would also be a possibility. (Revolving door practices refer to people moving between public service roles, political roles, and lobbying roles that all involve the same industry, giving them a level of inside expertise). The Commission is taking an interest in the public servant side of the revolving door, while the Ministry of Justice is looking at the ministerial side. This could mitigate risks of regulatory capture or conflicts of interest through some combination of increased transparency and the implementation of stand-down periods between roles.

Increasing the transparency and accountability of public procurement has also been a recommendation area for TINZ, with a focus on anti-corruption measures. The Government Procurement System Lead hosted by the Ministry of Business, Innovation, and Employment and the procurement rules they administer would be a natural fit for this work, which could include strengthening reporting on compliance (currently self-reporting) and increasing a focus on oversight and integrity of procurement processes.

Other options would include systematically checking whether guidance has been followed, or considering who the standards are issued to. This last point is of particular importance in light of trends around the use of third-party service providers. There are already some procurement and contracting practices that ensure private and community organisations funded to deliver public services are aware of the high integrity expectations that apply to these activities, but this area might benefit from renewed attention and monitoring.

Culture

Whole-of-society

This is the area of focus in the OECD's framework which is the furthest from the usual work that the Commission does to improve public service integrity. But in the context of the trends we discussed earlier, this may be the area that yields the most significant gains, as those trends have highlighted just how significant the conditions in broader society are for the state of public service integrity.

The opportunities here are to extend our focus outward and build awareness across society of the widespread benefits that public service integrity has, the challenges it faces, the work underway to address those challenges, and the norms, values, and constitutional conventions that underpin our integrity system. This might include **civic education campaigns** about public service integrity, especially in schools (for example, building on civics education resources offered by the Ministry of Education). This kind of public communication and increased visibility about what the public service does and how it behaves could help improve indicators based on perceptions of integrity.

It would be useful to **learn from other countries** with traditionally low corruption about how they approach public campaigns around integrity, as these are likely to be different compared to countries with higher corruption. Sweden may be a useful example, as a country with low corruption that is also a leader in civics education, paying attention to helping citizens become involved and understand political decision-making processes. Developing these kinds of activities in New Zealand would collectively work to reduce tolerance for violations of integrity standards and build a national integrity culture that then supports public service integrity culture.

Other opportunities include **engaging with the private sector and civil society** about how high integrity in business and non-profit activities can complement public service integrity and deliver shared benefits. It might involve more targeted efforts to **encourage and strengthen capability in watchdog organisations, citizen groups, trade unions and independent media**, giving those organisations greater recognition for the important role they play in public service integrity. In Australia, this has been achieved by including a wider range of organisations in communities of practice for ethical behaviour and corruption prevention alongside public sector actors (including local government, universities, and state-owned organisations).

The other options in this area involve **learning from and working with the private sector**. There may be some benefit in understanding the drivers behind different levels of trust in the private sector compared to the public service and elected officials. It might also be helpful to understand the views of business leaders who are surveyed on their perceptions of corruption to give our overall Corruption Perceptions Index score. Their insights might help address corruption risks, and the private sector is often considered a constructive partner or stakeholder in anti-corruption work.

In light of the demographic trends discussed earlier in this briefing, thinking about public service integrity from a whole-of-society perspective will involve new considerations about how the public service can best continue to reflect and serve the diverse population of New Zealand. Community engagement and cultural competence will be important supporting tools that will help the public service understand what integrity means to people with different views and backgrounds and from different geographic regions around New Zealand.

To support this, one of the options suggested through public consultation is to have '**community integrity audits**' conducted by panels that include independent voices from diverse sectors and communities (e.g. ethnic, migrant and faith-based communities). Integrity agencies could be more deliberate in engaging relevant stakeholders in the development and implementation of the public integrity system. This would ensure policies and frameworks can stay reflective of an increasingly diverse population.

Leadership

The Commission has a significant role in relation to public service leadership and therefore we have several levers that would help build the profile of integrity at the highest levels of leadership and set the "tone from the top."

One of the strongest options here, in alignment with the OECD's recommendation, would be to **include integrity leadership more prominently as part of public service chief executives' appointment and performance requirements**. This would make the minimum standards and other expectations for agencies set by the Public Service Commissioner more explicit and link them to performance. It would ensure that our most senior leaders are recruited and promoted for building pro-integrity cultures and taking responsibility for identifying and managing risks to public service integrity.

To be truly successful, these new requirements should emphasise values rather than just compliance, and be accompanied by training and guidance that supports managers in their ethical leadership roles. For example, scenario-based masterclass training on specific integrity expectations, and discussions around the 'grey areas' of ethical leadership and how to have uncomfortable conversations.

Other jurisdictions have already implemented similar measures. For example, in Victoria, public sector executives have a goal to 'role model and embed an integrity culture,' which includes measures and discussion prompts that they can use in their performance development plans.[177] In Western Australia, assessment of how agency leaders demonstrate and promote integrity is part of their agency capability reviews, with a framework of 21 capabilities introduced in 2022.[178]

An approach like this which is driven by performance management will likely require a wider culture shift that is more tolerant of failure. This is because chief executives and their agencies have historically tended to be focused on and driven by reputation. This is especially evident when it comes to innovation, where new ways of thinking and doing things are sought after without acknowledgement that failure is an inherent part of experimentation, which instead encourages a closed and protectionist attitude among public servants.

Workforce capability (merit-based appointment, training)

One of the key options for improving workforce capability around integrity issues is to **strengthen training offerings**. The OECD has recommended that New Zealand continue its trend towards a more preventive, rather than reactive, integrity approach by investing more in training on integrity issues,[179] and TINZ have also called for cross-public-sector training on integrity codes.[180] As noted in a 2023 report on values and ethics in the Canadian public service, in a post-pandemic hybrid work setting there are "fewer conventional opportunities for ongoing dialogue on the core values and ethics of the institution in the way that physical presence previously facilitated."[181] Training is one way of ensuring this dialogue continues to take place in hybrid work environments.

Training is likely to be most effective when it is provided on an ongoing basis, to ensure that it's always up to date, and is linked to organisational policies and procedures. This could be accompanied by declarations from chief executives to attest that they and their staff have completed the latest training, and this could be linked to their performance expectations.

The OECD has indicated that integrity training should not just focus on awareness-raising but should include **induction and regular ongoing training**, and can draw on experiences from other countries. **Scenario-based learning** that draws from 'real life' problems and could be offered online is an approach that has proved effective elsewhere, and some of the points identified in the leadership and standards categories above might also be useful topics for training offerings.

The other key area of focus in relation to workforce is **ensuring that the public service principle of merit-based appointments is being upheld**. There are some emerging concerns about practices of shoulder-tapping, and of the interaction between principles of diversity/inclusion and merit that have emerged through the Public Service Census (as discussed in earlier in 'Assessments of our performance').

As raised in consultation on the draft briefing, ensuring that the public service attracts and retains staff from the widest possible pool of talent supports the merit principle. Improving human resources practices around merit-based appointments is one element of the system response plan to the 2025 Census. Applying the merit principle and attracting a wide pool of capable talent are also two focus areas of the Commission's refreshed *Workforce diversity strategy*, which includes guidance for agencies.[182] The Census presents an opportunity to continue monitoring these concerns, as discussed in relation to measurement in the 'Strategy' options section.

Merit is also an area of interest specifically in relation to appointments to the boards of Crown entities and other public bodies that are not departments. Options to strengthen these include increasing transparency of appointment processes and ensuring that there is a pool of candidates with appropriate capability from which the public sector can put forward suitable candidates.

Another workforce option related to merit-based appointment – and mentioned specifically for leaders in the 'Leadership' options section – is to **ensure that the public service continues to recruit for integrity**. Recruiting the right person in the right way, including making proper reference checks and screening against integrity standards, will have a significant impact on the public service's culture of integrity and reduce risks of insider threat and foreign interference. The Commission's model standard on workforce assurance and personnel security requirements sets out expectations in this area and includes consideration of the levels of rigour that are appropriate for different levels of security clearance.

Openness (organisational culture, speaking up/whistleblowing)

One of the core mechanisms for openness in the public integrity system is the protected disclosure system that gives whistleblowers the confidence to speak up about integrity breaches. External assessments have highlighted New Zealand's system of protected disclosures as an area that could be strengthened, based on a deep evidence base for whistleblowing reforms.[183]

Strengthening the Protected Disclosures (Protection of Whistleblowers) Act itself **–** for both the public and private sectors – is a core option in this area. While the Act was updated in 2022, there may be scope to review the effect it has had and increase visibility by communicating and promoting the changes to the public service and public. There may also be scope for further changes. Particular areas of focus for review might include:

- how protected disclosures are defined and measured (e.g. with thresholds for "serious" wrongdoing and "reasonable evidence"),
- requirements and guidance for organisations to support disclosers and protect them from retaliation,
- whether there are types of disclosures that might be falling through the cracks – for example, disclosures about bullying,
- interaction of special rules relating to information about intelligence and security, defence, and international relations that result in narrowly assigned appropriate authorities, and
- whether journalists and the media should be included as appropriate disclosure authorities under specific conditions (as they are in Australia and Canada).

Outside the legislation, other options include providing guidance on protected disclosure procedures to private sector and non-governmental organisations (NGOs), and the possibility of establishing a protected disclosures forum (like the Official Information Act Forum)[xvi] to help practitioners build capability and share knowledge. Other work on complaints management processes and transparency is already underway, but it may be possible to **support agencies and chief executives** more in their responsibility for these disclosures as part of both operational employment matters, and integrity and conduct minimum standards.

[xvi] The OIA Forum helps build agency capability to make more information publicly available, by allowing OIA practitioners to share their knowledge with those who are new to the field.

The protected disclosures system fits within a broader context of speaking up and complaints processes, where there is also room for improvements. This broader system is especially important in terms of making sure complaints or disclosures do not fall through the cracks. One of the key options in this area is to broaden the **'no wrong door' approach for reporting** issues (also considered in the SFO's draft briefing in relation to fraud and corruption) and increase the overall channels available for reporting possible integrity breaches.[xvii] This relates to overlapping roles and responsibilities, where reported incidents might not be relevant to the particular agency they're raised to and may not be forwarded to a more suitable agency.

There may also be issues raised that do not meet relevant thresholds for any agency but are nonetheless important for capturing a picture of integrity issues across the system (i.e. they might add up to early warning signs). The development of a such an approach would therefore be an exercise in working together to collectively identify which agency has responsibility for the contents of a complaint or disclosure. There are already pockets of practice in line with this approach (e.g. under the Oversight of Oranga Tamariki System Act 2022), but these are not consistent, especially outside the core monitoring and oversight agencies. A 'no wrong door' approach may also have benefits for smaller or less-resourced agencies that could benefit from centralised capabilities in responding to integrity issues.

Openness is also an important characteristic at the organisational level and therefore requires culture interventions. The willingness of someone to speak up about possible wrongdoing (or the willingness of someone to overstep the bounds of integrity in the first place) may have as much to do with the culture of the organisation as it does with formal processes. Measures to protect psychosocial and psychological safety[xviii] are the foundation of an open organisational culture and deliver significant benefits to general performance as well as to disclosure processes. Such measures make employees more likely to contribute innovative ideas, constructively challenge decisions and processes, and feel satisfied at work.

Practices like the use of non-disclosure agreements in the settlement of cases of workplace bullying or harassment can hamper efforts to build an open and psychologically safe organisational culture, although confidentiality agreements will be important in some cases.[184] Similarly, limited avenues (and high legal costs) for complaints about the procedural integrity of investigations may also have a dampening effect on the willingness of others to raise new complaints, running counter to speak up cultures.

[xvii] The Protected Disclosures Act already takes a similar approach, where any public sector agency is an appropriate authority to receive a disclosure and disclosures can be referred on as appropriate. This option relates to the broader system of complaints and disclosures which may not meet thresholds for protected disclosure.

[xviii] See Worksafe for a list of common psychosocial hazards and ways to manage them: https://www.worksafe.govt.nz/topic-and-industry/work-related-health/mental-health/managing-psychosocial-risks-at-work/.

Options discussed throughout other sections can also contribute to more open organisational cultures. Specific actions can include simple **willingness to have conversations about integrity issues** (especially discussion of grey areas where people may be overstepping without knowing it) and being able to address uncomfortable topics from a non-judgemental learning perspective. These options are also mentioned in the leadership section, as leadership is a key factor for organisational culture. Again, they relate to the importance of an **attitude shift away from risk aversion** and tendency to address the effects of issues rather than their cause.

Accountability

Participation and transparency

Public participation in government was the subject of the Commission's previous long-term insights briefing. That briefing identified options around

- a common framework and measurement for understanding what participation methods are used across the public service and in what way,
- trialling more innovative approaches (e.g. representative deliberative approaches) in priority areas, and
- setting expectations to encourage a broad shift toward more collaborative approaches.

Like participation, transparency and openness are also significant topics that deserve specific focus. This section outlines a few narrow options that relate to the key integrity risks covered in this briefing.

As discussed earlier in the standards section, expert stakeholders like TINZ, the OECD, and Health Coalition Aotearoa are interested in efforts **to increase transparency around lobbying, beneficial ownership, conflicts of interest, and political finance.** As noted earlier, lobbying and political finance are largely outside the scope of this briefing but could be considered as part of a broader integrity strategy/strategic approach.

In terms of beneficial ownership and conflicts of interest, public servants' interests are currently treated as private employment matters even at the most senior levels. This is the result of a high priority given to privacy considerations. However, more thought needs to be given to how to balance privacy considerations where the interests are likely to be material for public service integrity. Many of the Commission's recent reviews have revealed conflicts of interest as major issues, and they are a topical matter among ministers and internationally.[185]

Chief executives of public service agencies and statutory Crown entities and their boards are expected to regularly disclose gifts, benefits and expenses, to provide transparency and accountability for discretionary spending.[186] These are published on agency websites each financial year.

The same approach could be taken to disclosed interests, and conflict of interest management plans. **Publishing a register of senior leaders' and boards' interests that might result in possible, potential and perceived conflicts** would enable comparison across public agencies to ensure that interests are being managed consistently and appropriately, especially in cases where management is a matter of judgement.

This kind of transparency would also allow the public to better hold leaders to account if they have concerns around the quality of decision making. In Canada this transparency is achieved through an office for conflicts of interests that does centralised reporting (mainly covering members of parliament and their staff).[187]

Another aspect of transparency involves how the public service communicates with the public to demonstrate how they have delivered value and acted with integrity. Consultation and stakeholder engagement suggested the use of **performance reporting to show communities that the public service can be trusted and is operating with integrity**.

Performance against indicators (discussed under strategy, above) could be integrated into agencies' annual performance reporting with underlying data subject to internal audit or external review, allowing for greater transparency around integrity performance. The Commission would have a role to play in this at the whole-of-public-service level (e.g. as we already do with our awards programme), while individual agencies would also have a role in communicating directly to their key customers and stakeholders.

Engaging with the public on what integrity means to them and what they value most may also help to inform performance reporting and integrity indicators that reflect outcomes rather than compliance measures. Trends may also have an influence here – for example, the wider use of AI may see demand for performance reporting on how AI is being implemented with integrity (especially given New Zealanders' comparatively low trust in AI).

Relatedly, there may be opportunities to **strengthen the Official Information Act (OIA) and proactive release systems**, where TINZ has recommended a more centralised approach. TINZ have also recommended more transparency around the expected and actual effects of agency restructuring, in order to ensure accountability for the long-term consequences. Reports from oversight authorities in the UK and several Australian states have likewise called for better measurement and reporting on the benefits and costs of restructuring to support transparency and accountability.[188] The Ministry of Justice, which administers the OIA, is exploring policy options in this area. Other areas of OIA strengthening suggested through consultation include:

- digital solutions like a centralised repository for reporting and the use of AI to support processing requests and responses;
- examining the rationale and need for carve-outs from the OIA;
- good faith immunity for proactive release to increase incentives or remove disincentives to release, or consideration to a new part within the OIA to recognise and regulate the proactive release of information;
- establishing OIA officers (like privacy officers), whose role would include policy advice, review of OIA decisions, and promotion of best practice. This might allow for better engagement with oversight agencies, fewer errors, and quicker complaint resolution.

Enforcement and oversight

New Zealand already has a comparatively robust system of oversight functions and agencies, so options here mainly relate to protecting and improving how those functions work together and strengthening the transparency of their findings.

There are real strengths in how the system of oversight functions and agencies is currently set up – for example, the OAG is considered to have a high degree of financial independence and autonomy and the Ombudsman is among the independent oversight bodies that Australia looks to for funding models.[189] But there are still risks that New Zealand's reliance on convention leaves us vulnerable to checks and balances being overridden by those in power,[190] especially through control over funding arrangements for the integrity system as has come up in Australia.[191] These risks include erosion through reprioritisation away from integrity activities if they are not seen as valuable, or more deliberate de-funding to avoid detection or criticism of integrity issues like corruption.

Possible action in this space could include strengthening parliamentary functions (OAG and the Ombudsman) and their **funding arrangements to protect independence** or **strengthening funding streams** to executive bodies and NGOs by putting protections in place to ensure continuity.

As discussed in the options section about responsibilities, the creation of a single agency could be costly and complex. Alternatively, **improving the coordination and information sharing between monitoring and enforcement agencies** would ensure that all potential issues are being picked up and dealt with fairly, objectively, and within appropriate timeframes. The Ombudsman has some provision in legislation to consult with and refer complaints to a limited range of oversight bodies, but there may be scope to expand such provisions across more agencies to increase information sharing and improve oversight of executive government decision-making. Better coordination and transparency would also help ensure consistency in identifying poor behaviour that constitutes an integrity breach and in how those breaches are addressed, which is especially important at senior levels.

In terms of investigations and reviews, it may be helpful for public service agencies and the public to have a greater understanding of how the process works and how accountability is demonstrated through appropriate responses to the findings. The Commission could take a more proactive approach to education about some of the most commonly investigated issues. This would also help ensure that reviews result in appropriate improvements to how agencies do things.

There is also a strong connection between oversight, monitoring, and measurement of integrity performance. Options around measurement that would give better oversight of performance against integrity-related outcomes discussed earlier are also relevant here.

The Commission often has little visibility of whether or how well agency practice aligns with (or exceeds) the minimum standards of integrity and conduct, except when things go wrong and we need to take a closer look. **Systematic monitoring** of the full extent of integrity practice is generally challenging and costly, but various combinations of other mechanisms may provide a more complete view of the system. These could include agency self-assessments; centralised reporting on key measures; and agency- or process-specific deep dives through Performance Improvement Reviews, investigations and other reviews.

TINZ have suggested central reporting and monitoring of all misconduct and breaches of integrity within public entities. The Commission has this to some extent, but we could consider **consolidating and publishing monitoring information** to encourage improvements and increase transparency (as discussed in relation to strategy as part of measurement options). Increasing transparency around monitoring would also give greater visibility to enforcement mechanisms and outcomes and how effective they are, although there are likely to be confidentiality considerations with this approach.

Consultation on the draft briefing raised the possibility of new or improved public institutions and constitutional watchdogs to strengthen integrity oversight. One potential model is the Committee on Standards in Public Life in the United Kingdom (UK), now the Ethics and Integrity Commission (see Appendix 4).

This body has a role in protecting the integrity of the public service as part of a wider mandate covering all aspects of 'public life' (e.g. wider public sector, parliament, local government). Outlining roles and functions of existing watchdogs (as has recently been done in the UK for watchdogs on the executive[192] and parliament[193]), could potentially be part of the system mapping exercise described in the following section on 'strategy'. The UK reports go on to make recommendations for strengthening the system of constitutional watchdogs. As these functions extend beyond the Commissioner's focus on public service integrity, activities in this area would rely on buy-in for reconsidering and reforming New Zealand's current arrangements.

Risk management

Improving risk management covers a range of activities within agencies, particularly internal audit and procedures for responding to potential fraud and corruption. There may be scope in some agencies for clearer accountability for integrity oversight across chief executives, risk and audit committees, and boards.

The OECD recommends that integrity elements be included in risk management and internal control processes. The OAG's integrity framework for organisations offers practical guidance for how public service organisations can integrate integrity elements into their risk management processes to become more proactive at identifying and responding to integrity risks.

There may be an opportunity for the Commission to join with the OAG to promote this resource in a more coordinated way throughout the public service. Internal risk and audit procedures are a key mechanism for addressing potential fraud and corruption, and there may be potential to **improve the monitoring and quality assurance of agencies' risk and audit capabilities**. Building these capabilities will be important for responding to emerging risks, such as cybersecurity and AI integrity risks. There is potential for a more visible role for internal audit across agencies, for example through minimum internal audit standards across the public service to improve consistency and reduce fragmentation.

Ensuring that system efforts to address fraud and corruption are well aligned to broader integrity work is a focus for the Commission in its current work programme (e.g. in the cross-agency Anti-Corruption Taskforce pilot as covered in the current approach and performance section).

Future work here is likely to involve **implementing recommendations from the upcoming United Nations Convention Against Corruption peer review** and will be run by the anti-corruption taskforce. The Commission also notes that trends in the detection of fraud are the focus of the long-term insights briefing from the Serious Fraud Office. Fraud was a particular area of interest through our consultation, with feedback recommending more enforcement and publicity around the investigation and prosecution of fraud. Insights from the SFO's briefing are likely to be relevant to the Commission's wider integrity standards and practices, as much of that work contributes to reducing the likelihood of fraud and corruption before it happens (e.g. conflict of interest management and transparency).

Whakakapinga | Conclusion

New Zealand is in a strong position in terms of public service integrity, with valuable elements of national culture, high rankings in international measures, and high trust and satisfaction in the public service by the people it serves.

But we need to stay alert and proactive about protecting this foundation and building on it further. A reactive approach will not be enough to protect against changing context as well as the pressure that integrity has been under over recent decades. We can see these pressures in international incidents where other countries with historically high trust and integrity have had integrity failures.

Broader trends across a range of dimensions indicate that known challenges to integrity will continue into the future. We expect that integrity challenges will also evolve and occur in new areas, especially as a result of unforeseen interactions between trends.

Some trends are likely to have a direct impact on the public service integrity challenges we will face over the next 10 to 15 years:

- The rise of transnational and serious organised crime is expected to translate into a rise in corruption risks, including in the public service. This increasing risk is already prompting cross-government action.
- Concern is growing about the influence of large corporations (especially Big Tech) on policymaking and political institutions. In this context, transparency of conflicts of interest may be of increased importance, as may the capacity of watchdog institutions and citizen groups.
- The risks and opportunities of AI are covered extensively in thinking about both integrity and the future. We need to consider how our integrity frameworks should best account for the general use of these technologies (e.g. through transparent decision-making, open organisational cultures, and listening and responding to complaints) and how they can be harnessed to improve our specific integrity activities. International examples like Robodebt in Australia, the Dutch childcare benefits case, and the British Post Office Horizons case illustrate how the use of digital government systems without proper human oversight and open organisational cultures can harm citizens and undermine trust. More broadly, these cases point to how integrity failures can happen when public agencies and public servants lose sight of protecting the public interest.
- Trends such as politicisation and the erosion of democratic institutions will only heighten these risks in future. Challenges to democracy and a rules-based international order are a fundamental risk for integrity. Integrity supports the legitimacy of our democratic system, so having democracy facing unprecedented challenges (again interacting with other trends around social cohesion, polarisation, technological change) highlights both the essential importance of integrity and the pressures it faces.

Across these trends, some implications are related to the societal values that dictate how integrity is defined and what it should mean in a public service context. While the essentials of our integrity framework have been stable over time, integrity only has meaning based on widely held norms and values and on the public's expectations around the role of government. This means that different elements of integrity have had shifting emphasis depending on the broader context the public service is operating within.

At a practical level, other integrity implications of the trends are related to what the work of government looks like and how it's being delivered. Our current integrity framework has been developed in line with our current model of public management and administration. Significant changes in what services are being delivered (e.g. much greater levels of disaster response) or how (e.g. greater use of AI or of devolved service delivery through contracted private providers) will bring different profiles of integrity risk that may need to be approached differently. More use of third-party service providers seems likely in light of many different trends, so thinking about how to maintain standards of public service integrity outside the core public service will be important for the future.

With this uncertain future in mind, we considered the areas of strength and opportunity in our current approach using the dimensions of the OECD Recommendation – system, culture, and accountability.

Some of the key strengths in our current approach to integrity are that it has built on a robust national culture of integrity, with low tolerance for corruption and high value placed on fairness. This has given us a respected international reputation for low corruption and high trust. We also have a well-established framework of standards and expectations set out in legislation, a code of conduct, and other guidance. Although our institutional integrity system may appear fragmented from the outside, the key agencies are aware of their respective roles and responsibilities and are already working collaboratively on how to ensure coordination and alignment. Finally, our devolved public management system that gives agency chief executives responsibility for integrity matters lends itself well to integrity leadership, as reflected in positive results from the Public Service Census. The cohort of chief executives, alongside their senior leaders from the Integrity Champions network, are a clear avenue through which to set the tone from the top and provide integrity leadership for the rest of the public service. This agency leadership complements the Commission's own role in providing leadership for the whole public service system.

But there are some opportunities to improve and evolve our approach in order to meet emerging and future challenges. Our reliance on perception measures and other disparate indicators has meant that we do not necessarily have a clear and comprehensive picture of our integrity performance across all dimensions and across the whole public service.

While coordination and collaboration between key agencies is underway, this is not necessarily visible to the public and more could be done to create alignment that is visible to those outside the system. Our strong framework of standards and expectations is not always brought to life and consistently applied in agency practice and decision making, as evident in matters that have recently required investigation and review. This is a failure of training and capability support. And there are several more detailed elements of our integrity approach that we have found may need further attention – speaking up processes and culture, merit-based appointments, conflicts of interest, and fraud and corruption. Finally, much of our integrity work has been inward looking. We have been remiss in communicating to the public about why public service integrity is important and how we apply and demonstrate it, and in asking what parts of integrity are most important to those we are serving.

These areas for improvement and evolution will help us achieve the long-term vision set out in the Public Service Act 2020 for a public service that:

- has a strong and unified culture of integrity, which consistently upholds expected standards of behaviour,
- is responsive, politically neutral, and offers free and frank advice to the government of the day,
- holds the trust and confidence of New Zealanders,
- improves performance and reduces costs, and
- maintains its international reputation for integrity and effectiveness.

Despite uncertainties in how the future will play out, there are some clear areas where international examples and expert recommendations suggest our efforts would pay off:

- **Measurement** – As we move into an unpredictable future, it will be even more important to have timely and reliable data that helps us understand how the changing world is affecting public service behaviour and integrity. We could improve the consistency and comprehensiveness of our data about our integrity performance across the public service by streamlining and drawing together the data we already collect across other requirements and ensuring that any new integrity requirements are also associated with measurement (e.g. training completion rates).
- **Workforce development** – We are in a strong starting position from which to build a richer set of induction and ongoing training offerings, focused on the sorts of integrity topics that are likely to be relevant to public servants into the future (e.g. integrity in contracting with private service providers, integrity in the use of AI, integrity in the face of public and political polarisation, etc.). Recruitment is also a key element of workforce capability. Ensuring we are screening out candidates with low integrity as part of our merit-based appointment processes will both directly address integrity risks and contribute to a pro-integrity culture in the public service. Training is a way of supporting and developing the integrity and ethical decision making of these people throughout their careers.

- **Public education** – There are also opportunities to expand our focus and build public understanding of integrity through education programmes. This would be avenue through which to raise awareness of the pressures the integrity system is under, the complexity of the challenges it faces, and the efforts that are being made to meet those challenges. It would also contribute to a whole-of-society integrity culture that supports our public service integrity culture. A well-informed and engaged public is an essential part of our accountability and integrity system, providing public scrutiny and supporting a healthy democracy.
- **Fraud and corruption** – The specific integrity risks of fraud and corruption are likely to be heightened under many of the possible future conditions suggested by current trends, so focusing on reducing those risks now will have benefits regardless of specific uncertainties.
- **Coordination and alignment** – Although the key institutional players are already aware of the importance of coordinating with each other and staying aligned, having a clearly articulated understanding of what the system looks like, how it operates, and what the operating context involves would reduce the necessity for more costly and complex coordination mechanisms.

Whatever direction we choose, it will be important to continue considering the right balance between rules-based compliance mechanisms, and efforts to foster a culture of proactive integrity and ethical behaviour among our public servants. Integrity will continue to be a fundamentally important characteristic of the public service, reflected in the public's expectations of us. Paying attention to how we do things as well as what we do has a range of tangible benefits that will serve us well under uncertainty. Building on our strengths and addressing challenges will ensure that we maintain the trust and confidence of ministers, Parliament, and the public, and can continue to serve New Zealanders with integrity.

Ngā Āpitihanga

Appendices

Āpitihanga 1: Te whakawhiti kōrero | Appendix 1: Consultation approach

This appendix outlines the consultation approach we took for the briefing. Under the Public Service Act 2020, there are two rounds of required public consultation for long-term insights briefings – on the subject matter of the briefing, and on a draft of the full briefing. This is the final briefing.

Consultation on the subject matter

In September and October 2024, we published a consultation document and invited submissions from members of the public to help us identify which of three possible topics would be of most interest to focus the draft briefing on. The three topics were:

- The future of the public service workforce
- The future of public service integrity
- The future of public service organisations

We sought submissions through a range of channels. We received 60 submissions in total, from individuals, organisations, and public servants.

Feedback from submitters indicated clear relationships between the different topics. This was especially the case for the workforce topic, because how the workforce is configured is part of public service organisations and system design, and how the workforce behaves is part of public service integrity.

Deciding the topic

All the topics we consulted on were relevant to the Public Service Commission's specific role and functions within the public service. The Public Service Commissioner took feedback from the consultation into consideration and selected the topic 'The Future of Public Service Integrity'.

Matters relating to public service integrity raised in the submissions included:

Trust and social licence

- Trust: 16 submissions mentioned the importance of integrity for maintaining public trust and confidence. For example, one submitter said, "Integrity is central for building trust between government and its citizens." Another submitter noted that public service and government institutions draw on this trust for their social licence.
- Misinformation: Seven submissions mentioned issues around mis- and dis-information, with several of these specifically concerned about the quality and trustworthiness of information communicating the role and operations of the public service.

Specific integrity issues

- Current problems: Many submitters who prioritised this topic highly had concerns about specific integrity issues, including unauthorised disclosure, fear and favour, institutional racism, and implications of artificial intelligence (for accuracy, bias, explainability, privacy, and potential for misuse or harmful outcomes).
- Politicisation was a key concern, discussed in terms of polarisation, the principle of political neutrality and political appointments, and the culture of the public service and its relationship to ministers. Many submitters particularly noted the impact of the relationship between politicians and the public sector as a driver.

Accountability, oversight and controls

- Consequences: Eight submissions talked about the need for clear lines of accountability and consequences for a lack of integrity at the individual level. As part of this, some thought that watchdog organisations needed greater authority. One submitter noted that investigations are most effective when they lead to work programmes to address the identified issues. Another submitter noted that preventative controls should be prioritised because responding to an incident means it is already too late.
- Reporting: Three submissions suggested that the integrity system needs greater independent monitoring and reporting of breaches. One submitter argued that independent monitoring could identify indicators of integrity issues before they led to actual incidents.

Culture of integrity

- Ethics and action: Several submitters discussed features of integrity that relate to strengthening and sustaining integrity at the cultural level within the public service. Some considered this the best way to bridge the gap between ethics and action. Enablers for this included leadership that could "set the tone from the top," training, and a rebooted Code of Conduct, and looking at integrity as an aspect of performance.
- Strong foundation: One submitter acknowledged that New Zealand does already have a foundation of ethical culture, while another emphasised that culture needs to be considered in totality rather than focusing on component part like a 'speak up' culture or 'positive and safe workplaces.'

Consultation on the draft briefing

The briefing was drafted based on desktop research and data from other Commission work programmes, feedback from the first round of consultation, and workshops with internal and external expert stakeholders.

The final draft of the briefing was published on our website, and we again invited comments through email or online survey. Consultation ran from 30 July 2025 to 24 August 2025. We received 24 unique submissions across the survey, email, and one in-person feedback session. We heard from four organisations, seven public service organisations, four individual public servants, two academics, and seven members of the general public.

Much of the feedback was positive, supporting the options we had identified and noting the comprehensive coverage of trends and the current state. Among the feedback that suggested clarifications and additions to the briefing, key themes are outlined below.

What might impact public service integrity in the future?

- **Mis and disinformation:** challenging to prove or disprove facts because of variable information sources, labels of mis and dis-information might be mistakenly applied to ideas or other information through politicisation, polarisation, and ideological interference
- **Political polarisation and democratic integrity:** role of xenophobia, inequality and foreign interference; political neutrality and political responsiveness issues; urban-centric public service culture alienate regional and diverse communities; concerns about disproportionate or undue influence; rejection of evidence-informed policies and the rise of post-truth politics; disillusionment with the political system and desire for an authoritative leader to emerge.
- **Demographic representation:** aging population focus overlooks younger Māori and Pacific communities (who are likely to make up a significant portion of the future workforce) and geographic concentration of different needs; ethnicity as a valid marker of need.
- **AI:** too much emphasis on AI risks, existing public service use of AI, importance of clear principles, equity risks around underrepresentation in training data and equality risks, tension between preserving integrity/privacy and speeding up adoption of new technology. Key issues around transparency, human oversight, accountability, and loss of institutional memory (replicating patterns without context, reducing awareness of historical lessons or relationships), privacy, cybersecurity and information management.
- **Other:** Polycrisis or permacrisis that comes from looking at all the trends and drivers together

What should we do now to strengthen public service integrity in the future?

- **Institutions (responsibilities):** complexity of institutions and processes, independent public institutions and constitutional watchdogs, single anti-corruption agency, coordination and information sharing between monitoring and enforcement agencies (e.g. arrangements under the Oversight of Oranga Tamariki System Act 2022), minimising gaps and overlaps in integrity-related frameworks – reduce compliance costs
- **Strategy and measurement:** equity-centred integrity measured not just by compliance but by lived outcomes, more detailed measures for strengthening integrity, could be integrated into agencies' annual performance reporting, with underlying data subject to internal audit or external review, engage with the public to ensure measures reflect what integrity means to them and what they value most, public agency integrity scores can drive unintended consequences
- **Standards:** renewed focus on positive and safe workplaces model standard to reduce bullying
- **Leadership:** visible integrity leadership – from the Commission and in the appointment and performance of CEs (leading by example)
- **Workforce capability:** bias and cultural capability training, merit-based appointments in boards and crown entities, consistent standards for screening public servants (not just those with national security clearance), relationship between merit and diversity and the public service workforce reflecting those it serves, public servants' political rights
- **Openness:** specific amendments to the Protected Disclosures Act and associated guidance, broader improvements to speak up processes including psychosocial safety, imbalance of power in relation to the use of taxpayer-funded employment lawyers and use of non-disclosure agreements, carve outs from OIA, good faith immunity for proactive release, establishment of OIA officers.
- **Accountability:** enforcement around fraud, institutional accountability through ensuring recommendations from reviews are acted on, improvements to internal audit and its relationship to integrity.
- **Other:** integrity among third-party providers – private and community organisations, differences across agencies and the impact of working context.

Comments on the briefing overall

- Sections didn't always link to each other – unclear how the treatments (which seemed sensible) were derived from the current problems or the emerging risks.

- Link between the Treaty of Waitangi and public service integrity should be woven throughout the document rather than relegated to its own section. The public service's role in supporting the Crown to fulfil its Treaty obligations is a more meaningful measure of integrity than international perception rankings.
- Specific comments in relation to the framing of the 'integrity in freefall' scenario in the executive summary, and two places that refer to the Serious Fraud Office's role and work.
- Could be strengthened by an increased emphasis on how integrity is influenced from within organisations.
- Use of New Zealand examples and official statistics – e.g. the General Social Survey contains valuable data on institutional trust, interpersonal trust, and sense of belonging, which could help illustrate trends in democratic resilience.

Feedback resulted in substantive changes throughout the briefing, especially throughout the options and trends sections, and the discussion of assessments of our performance. Some comments were not addressed as they were outside the scope of the briefing. For the full detail on both stages of consultation, see: www.publicservice.govt.nz/publications/our-long-term-insights-briefings/our-second-long-term-insights-briefing.

Āpitihanga 2: He Tauākī Whanonga | Appendix 2: Code of Conduct

STATE SERVICES COMMISSION
Te Komihana O Ngā Tari Kāwanatanga

STANDARDS OF INTEGRITY & CONDUCT

A code of conduct issued by the State Services Commissioner under the State Sector Act 1988, section 57

WE MUST BE FAIR, IMPARTIAL, RESPONSIBLE & TRUSTWORTHY

The State Services is made up of many organisations with powers to carry out the work of New Zealand's democratically elected governments.

Whether we work in a department or in a Crown entity, we must act with a spirit of service to the community and meet the same high standards of integrity and conduct in everything we do.

We must comply with the standards of integrity and conduct set out in this code. As part of complying with this code, our organisations must maintain policies and procedures that are consistent with it.

For further information see www.ssc.govt.nz/code

FAIR

We must:
- treat everyone fairly and with respect
- be professional and responsive
- work to make government services accessible and effective
- strive to make a difference to the well-being of New Zealand and all its people.

IMPARTIAL

We must:
- maintain the political neutrality required to enable us to work with current and future governments
- carry out the functions of our organisation, unaffected by our personal beliefs
- support our organisation to provide robust and unbiased advice
- respect the authority of the government of the day.

RESPONSIBLE

We must:
- act lawfully and objectively
- use our organisation's resources carefully and only for intended purposes
- treat information with care and use it only for proper purposes
- work to improve the performance and efficiency of our organisation.

TRUSTWORTHY

We must:
- be honest
- work to the best of our abilities
- ensure our actions are not affected by our personal interests or relationships
- never misuse our position for personal gain
- decline gifts or benefits that place us under any obligation or perceived influence
- avoid any activities, work or non-work, that may harm the reputation of our organisation or of the State Services.

newzealand.govt.nz

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Āpitihanga 3: He Aratohu | Appendix 3: Model standards and guidance

Model standards provide a practical explanation of how public service principles and values are applied and interpreted in a range of situations. Model standards include:

- Working with survivors
- Positive and safe workplaces
- Speaking up
- Workforce assurance
- Conflicts of interest
- Chief executive gifts, benefits, and expenses
- Information gathering and public trust

The model standards are brought together with other guidance in *He Aratohu - A guide for public servants on matters of integrity and conduct* along with *Ngā Pou – the principles guidance*, which provides information about the public service principles set out in the Public Service Act 2020: political neutrality, free and frank advice, merit-based appointments, open government and stewardship.

Guidance topics include:

- General election guidance
- Social media
- Guidelines for government advertising
- Sensitive expenditure
- Bribery and corruption
- Free and frank advice and policy stewardship
- Officials and select committees

Guidance from other agencies in *He Aratohu* covers topics such as sensitive expenditure (OAG) and bribery and corruption (SFO and Ministry of Justice). There is work underway focused on standards relating to conflict-of-interest management (embedding practical tools and resources including templates for management plans and case studies), and gifts and sensitive expenditure (in collaboration with the OAG).

Read *He Aratohu* in full at https://www.publicservice.govt.nz/role-and-purpose/integrity-and-conduct.

Āpitihanga 4: Ngā Tauritenga ā-Ao | Appendix 4: International comparisons

Many of the trends and potential implications discussed in this briefing are based on our observations of developments in other countries. This appendix describes recent developments in some countries that lead on public service integrity, or have similar public service integrity approaches to New Zealand. We look at recent public service integrity challenges these countries have faced, and how they have responded. While we have a different context, it is still worth considering which parts of their approaches to public service integrity are helpful for addressing certain challenges.

Australia

Australia is a particularly interesting comparison for New Zealand as another Westminster-styled parliamentary democracy with a shared heritage, although one with a federal rather than unitary system of government. In both countries, key integrity instruments include a set of public service values, a code of conduct and employment principles such as merit-based appointments. Despite these similarities, the Transparency International Corruption Perceptions Index has showed a consistently lower level of corruption perceptions in New Zealand. At the state level, Australia has a long history of dedicated anti-corruption agencies, beginning with the establishment of the NSW Independent Commission Against Corruption in 1988.

As in New Zealand, observers have described a degree of complacency towards corruption in Australia's federal politics and administration, which historically experienced fewer corruption scandals than state governments.[194] This began to shift in the lead-up to the 2022 federal election, when long-standing concerns about Australia's federal integrity system made integrity a central election issue. This was amplified by the country's declining position on the Corruption Perceptions Index. The 2019 *Independent Review of the Australian Public Service* had also recommended reinforcing Australian public service integrity.

Several prominent scandals also brought discussions of public service integrity to the fore. The first was the failure of the 'Robodebt' scheme. Robodebt involved an automated system designed to claw back supposed overpayments to people receiving the benefit. The system incorrectly calculated overpayments and notified them for debt collection. In a context of heightened demand for political responsiveness, the public service failed to listen to advice about the illegality of the scheme, resulting in significant economic and mental stress for those misidentified as owing money and causing suicides.[195]

Secondly, the PriceWaterhouseCoopers tax scandal involved information about government thinking on tax initiatives being shared and used to prepare international clients for changes in Australia. A third scandal has centred on fraudulent National Disability Insurance Scheme (NDIS) payments, including fraud by social service providers and rorting by organised criminal groups, drawing attention to the need for proper safeguards and scrutiny.[196]

Australia has recently introduced a set of integrity and anti-corruption reforms at the federal level. These include the establishment of a National Anti-Corruption Commission (NACC), which has delivered Australia's first Commonwealth Integrity survey; a new federal administrative review body; strengthened whistleblower protections; a new Commonwealth Fraud and Corruption Control Framework; a new Commonwealth Supplier Code of Conduct; and powers for the Australian Public Service (APS) Commissioner to initiate reviews and investigations into code of conduct breaches by current and former agency heads. An APS Integrity Taskforce has investigated and reported on how the APS can build a "pro-integrity" culture,[197] with initiatives underway in areas such as leadership integrity training.

Australia also has several groupings and agencies that are increasing attention on integrity matters, including an Ethics Advisory Service, Integrity Agencies Group, and several integrity communities of practice. In the 2024 Corruption Perceptions Index, Australia re-entered the top 10 for the first time since 2016, in part due to its integrity reform efforts.[198] There have been calls for Australia to go further in areas such as merit-based appointments and the independence of the APS Commissioner.[199]

Denmark

Like New Zealand, Denmark has consistently placed at or near the top of international public integrity rankings. Denmark has a long-established professional civil service, a history of anti-corruption policies and societal features supportive of integrity, including press freedom, high literacy and low inequality.[200] Comprehensive rules and ethical standards exist for civil servants. There is no code of ethics for ministers and MPs, although they do have legal and political responsibilities (including duties around truthfulness and conflicts of interest).[201]

Like New Zealand, Denmark has no dedicated anti-corruption strategy or specialised agency for dealing with corruption issues. Instead, trust and political responsibility are at the core of the Danish integrity system. Public integrity is supported by rules on ethics as well as social norms and public scrutiny. Concerns in recent external assessments include the lack of controls over lobbying and the 'revolving door' between elite positions in the public and private sectors, and whether Denmark relies too strongly on a high-trust model of integrity.[202]

Finland

Similarly, Finland is consistently placed at or near the top of international public integrity rankings. Finland's civil service has a strong legalistic tradition and a values-based integrity approach. The main focus has been on measures to encourage and support integrity culture in organisations rather than the prevention of unethical conduct through detailed rules and punishments.[203]

A recent OECD assessment has noted how the high level of professionalism and integrity within the Finnish public administration allows for an approach that emphasises trust civil servants over a strict compliance approach. This has benefits in terms of lowering the costs of control and improving the working environment,[204] although, as in Denmark, external assessment has raised concerns about a possible reliance on trust as a preventive tool.[205] Some of the main ways that Finland fosters ethical conduct and integrity culture have been the definition and communication of core values and ethical standards for the public sector. An independent body, the Advisory Board on Civil Service Ethics, has a key role in this area. While Finland has no separate anti-corruption agency, the Ministry of Justice oversaw the development of the country's first national anti-corruption strategy in 2021.

Netherlands

The Netherlands has taken a similar public service integrity trajectory to New Zealand, moving from a primarily compliance-based approach towards a mix of values-oriented and compliance approaches.[206] While public service integrity was high on the political agenda in the 1990s and 2000s, a 2019 assessment observed declining attention to public service integrity issues in the Netherlands.[207] The Dutch National Integrity Office (BIOS), an independent office focusing on the promotion of integrity in the public sector, including local government, was replaced in 2016 by a whistleblowers' authority with a narrower mandate. In 2019, a major public service integrity scandal emerged when it was revealed that an AI algorithm used by the government to allocate childcare benefits discriminated based on ethnicity and/or citizenship resulting in an estimated 35,000 false allegations of fraud.

The Netherlands typically ranks highly on the Corruption Perceptions Index, although its score has trended downwards since 2012. Over this period there have been several major corruption cases involving prominent municipal and provincial politicians, and other recent cases involving bribery in the national police force, the defence sector and border control. Like the Nordic countries above, concerns have also centred on insufficient controls on lobbying and the regulation of political integrity. With corruption in the headlines, the Netherlands is expected to give greater priority to the prevention of corruption, including the coherence of integrity instruments covering the public service, law enforcement agencies, and political actors.[208]

Singapore

Singapore is known for its success in moving from widespread corruption, in the mid-20th century, to very low corruption, surpassing New Zealand on the 2024 Corruption Perceptions Index. Key to Singapore's transformation was the establishment of the Corrupt Practices Investigation Bureau (CPIB) and introduction of comprehensive anti-corruption laws, driven by the People's Action Party (PAP) that has governed Singapore since 1959. The sole agency dedicated to combatting corruption in both private and public sectors, the CPIB reports directly to the Prime Minister and has prosecuted high-profile cases of corruption, including those involving cabinet ministers.

In recent years, a number of corruption cases involving the political elite have challenged the PAP and Singapore's corruption-free reputation, although its ranking in the Corruption Perceptions Index remains strong. High standards of integrity are supported by a strong focus on meritocracy in Singapore's public administration. Public servants are guided by a code of conduct based on principles of integrity, incorruptibility and transparency, and all public servants are required to complete annual code of conduct training. Challenges to public integrity highlighted by external observers include the absence of freedom of information legislation, dense ties between business and PAP elites, and legal pressures on free and independent media.[209]

United Kingdom

A range of institutions support public integrity in the United Kingdom (UK). Prominent among these is the Committee on Standards in Public Life, advises the prime minister on ethical standards for anyone elected or appointed to public office either nationally or locally (e.g. MPs, local councillors, civil servants, the police). In addition, the Central Propriety and Ethics team of the Cabinet Office maintains the respective Codes of Conduct for civil servants, ministers, and special advisers, and advises on their application. However, observers have suggested that the UK's system of integrity agencies is fragmented and they lack real independence, and that the standards framework needs strengthening.[210]

In July 2025, the UK government announced it would establish a new Ethics and Integrity Commission by strengthening and reforming the Committee on Standards in Public Life. The new body's wider remit includes a new obligation to report annually to the prime minister on the overall health of the standards system. It will also have a role in coordinating the different UK ethics bodies and improving public understanding of the ethics system. The establishment of the Ethics and Integrity Commission is part of a wider sweep of promised reforms to address declining public trust and a sharp downgrade in the UK's Corruption Perceptions Index rankings. This decline is attributed in part to the high number of political integrity scandals and high-profile failures the UK has experienced in recent years.[211] These include the Post Office Horizon, Grenfell, Windrush, and Infected Blood cases, which have also led to calls for public sector bodies to get better at recognising and responding to early warning signs of emerging problems.[212]

Other recent initiatives in the UK have focused on coordinating and strengthening anti-corruption efforts, including the establishment of the Joint Anti-Corruption Unit (JACU) in 2015 to oversee policy coordination between departments and agencies. The Anti-Corruption Champion, a personal appointment of the Prime Minister, is supported by the JACU. The UK has had some form of anti-corruption strategy in place since 2014, but published its first formal anti-corruption strategy in 2017 (the *2017-2022 Anti-Corruption Strategy*). Outcomes of the strategy have been described as mixed, with oversight reports continuing to highlight corruption risks in the public sector.[213]

Canada

Canada's public sector framework has been described as tending towards a values-based approach.[214] An overarching values and ethics code for the public sector sets out five categories of expected behaviour (respect for democracy, respect for people, integrity, stewardship, and excellence). Specific behaviours are outlined by agencies in relation to their mandates and work environments. Like New Zealand, Canada has no central unified integrity strategy or body, but has several specialised bodies that are absent from New Zealand, including a Commissioner of Lobbying and the Office of the Conflict of Interest and Ethics Commissioner. The Office of the Public Sector Integrity Commissioner (OPIC), an independent agent of Parliament, handles disclosures of wrongdoing at the federal level. As in New Zealand, commentators have raised concerns about fragmentation in relation to Canada's relatively decentralised approach to public service integrity.[215]

Canada's performance on the Corruption Perceptions Index has been declining since 2012, driven in part by challenges with financial crime but also cases of public sector corruption.[216] Public service integrity issues drawing media attention have also included the appropriateness of personal opinions expressed on social media, disclosure of classified information to foreign powers, and fraudulent behaviour.[217] Integrity bodies have experienced pressures, including an unprecedented number of disclosures to the OPIC generating a multi-year backlog.[218]

In the wake of the COVID-19 pandemic and a rise in public service numbers, the Deputy Ministers' Task Team on Values and Ethics was established to 'renew the conversation' on values and ethics in the Canadian public sector. A first stage report released in 2023 identified challenges contributing to a different public service context, including a rapid influx of new public servants, new ways of sharing values in a hybrid work environment, generational differences, and the prevalence of social media. Recommendations included ensuring that departmental codes of conduct are upheld with consequences for breaches; embedding governance structures that support leaders in ensuring best practices; and central agencies playing a greater role in raising awareness of public service values and ethics.[219]

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