

Independent Reporting Mechanism

Results Report:
New Zealand 2022–2024

Open
Government
Partnership



Independent
Reporting
Mechanism

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Executive Summary

New Zealand’s fourth action plan supported community engagement by government agencies. Following a change of government and reprioritisation of reforms, progress on commitments slowed. The OGP process would benefit from rebuilding trust between government and civil society stakeholders.

Implementation

Half of the commitments produced early results in opening government by the end of the implementation period. Under Commitment 1, government agencies received improved guidance on community engagement and learned from a community of practice. Commitment 2 published reports on lessons learned from pilot citizens’ assemblies in Auckland and Wellington. Commitment 6 updated the Government Electronic Tender Service (GETS) and laid groundwork for a portal that would improve procurement transparency. Commitment 8 advanced responsible government use of algorithms through an assessment toolkit and community of practice. No commitments had significant early results in opening government.

Overall, the action plan’s level of completion was lower than previous plans. Three of the eight commitments were substantially or fully completed. Progress was slowed by shifts in government priorities following the 2023 general election, and associated cuts to government spending that resulted from the incoming government’s policies. For instance, changed priorities halted progress on beneficial ownership transparency reforms under Commitment 5, the action plan’s most promising commitment.

Participation and co-creation

The New Zealand OGP process is overseen by the Public Service Commission | Te Kawa Mataaho (PSC).¹ It collaborated with a range of civil society organisations (CSOs) and five other government agencies, which were responsible for implementing the commitments. Until June 2023, the PSC was also advised by an Expert Advisory Panel (EAP) consisting of six civil society members. While government and civil society engaged at the beginning of the co-creation process, communication breakdowns led to some CSOs withdrawing by the end of the action plan cycle. Rebuilding trust between government and civil society stakeholders would benefit the OGP process going forward.

At a Glance

LEVEL OF COMPLETION

3/8

Complete or substantially complete commitments

EARLY RESULTS

4/8

Commitments with early results

0/8

Commitments with significant results

KEY OBSERVATIONS

- Implementation relies on ministerial buy-in and cross-party support.
- Adequate resourcing is key to commitment progress.
- The OGP process depends on rebuilding government-civil society trust.

Compliance with minimum requirements during implementation: No

During the implementation period, New Zealand did not meet minimum requirements 1.1 and 5.1 of the OGP Participation and Co-Creation Standards.² These require the establishment of a multistakeholder space for dialogue that meets at least every six months, and the hosting of at least two meetings every year with civil society to present implementation results and collect comments. Due to the grace period for implementing OGP’s updated Participation and Co-Creation Standards, New Zealand’s non-compliance with the minimum requirements currently does not affect its OGP status.

Implementation in Context

During the implementation period, the general election in November 2023 resulted in a new coalition government of three parties with priorities that diverged from those of the prior government. Uncertainty regarding the alignment of commitments with the new government’s priorities caused progress to stall or slow while this was clarified. In particular, the new government reduced government spending, in order to respond to election promises and meet their public debt goals,³ which hindered the progress of some commitments. Following the appointment of a new minister, the PSC awaited ministerial direction on OGP work, including arrangements for a future multi-stakeholder forum to replace the EAP.⁴ In December 2024, PSC published papers evidencing consideration of withdrawal from OGP.⁵ Ultimately, the New Zealand government remains an OGP member.

¹ “Open Government Partnership New Zealand” (accessed 18 April 2025) Public Service Commission <<https://www.publicservice.govt.nz/system/open-government-partnership>>.

² “OGP Participation and Co-Creation Standards,” (accessed 18 April 2025) Open Government Partnership <<https://www.opengovpartnership.org/ogp-participation-co-creation-standards>>.

³ Nicola Willis, Minister of Finance “Budget Policy Statement 27 March 2024” (27 March 2024) The Treasury <<https://www.treasury.govt.nz/sites/default/files/2024-03/bps24.pdf>>.

⁴ “Open Government Partnership Review” (18 December 2024) Public Service Commission <<https://www.publicservice.govt.nz/publications/open-government-partnership-review>>; Christine Lloyd and Dean Rosson (OGP Secretariat, Public Service Commission), interview by IRM, 16 January 2025; Christine Lloyd (OGP Secretariat, Public Service Commission), correspondence with IRM, 22 January 2025

⁵ “PSCR 2024 0010 RESPONSE New Zealand Council for Civil Liberties” (18 December 2024) Public Service Commission <<https://fyi.org.nz/request/28987/response/115033/attach/8/PSCR%202024%200010%20RESPONSE%20New%20Zealand%20Council%20for%20Civil%20Liberties%20OGP.pdf>>

Section I. Key Observations

The key observations below offer reflections from New Zealand’s fourth action plan cycle. These lessons aim to support New Zealand’s future action plans and broader open government journey.

Observation 1: Implementation relies on ministerial buy-in and cross-party support.

The PSC noted that New Zealand’s earlier OGP plans had stronger alignment with government priorities and ministerial backing throughout the duration of those plans, making them more successful than later plans.¹ This was evident in implementation rates—38% of commitments were fully or substantially completed during the fourth plan, compared to 75% during the third and 100% during the first two plans.² After the November 2023 election, midway through the fourth action plan cycle, the new government demonstrated a shift in policies and priorities.³ This impacted the plan’s implementation rate. To ensure ministerial buy-in for future action plans, the implementation of OGP commitments could benefit from cross-party political support.⁴

Observation 2: Adequate resourcing is key to commitment progress.

For most commitments, inadequate resourcing slowed progress and results, as noted by CSOs⁵ and government agencies.⁶ This was partly due to the new government’s spending reductions, in line with commitments made during the election campaign. For example, resource constraints hindered the Ministry of Justice’s consultation efforts under Commitment 7, as well as progress on delivering Commitments 1, 3, 4, 5, and 8. The EAP and CSOs highlighted the need for adequate resourcing and proposed innovative financing approaches, such as opening government funding for ambitious commitments to departments and CSOs to foster collaboration.⁷

Observation 3: The OGP process depends on rebuilding government-civil society trust.

The willingness of CSOs and government officials to engage in the OGP process relies on the formation of reciprocal and trusting relationships. Such trust is fostered through two-way communication, clear expectations, and openness about the anticipated opportunities and limitations of the context within which the action plan is developed and implemented. Civil society expectations, priorities of different government agencies, as well as support from ministers and from senior public officials were not aligned, making it difficult for PSC staff to meet expectations from multistakeholder dialogue. During the action plan cycle, CSOs increasingly hesitated to participate due to the lack of responsiveness to their suggestions. The term of the EAP, which would ordinarily contribute to building connections between civil society and government, expired during the plan’s implementation and was not renewed. Learning from the challenges faced during the fourth action plan cycle, ministerial and public sector commitment leads could take more proactive steps to build relationships with civil society partners and involve them in decision-making and deliberation processes.⁸ PSC and civil society could engage with a view to establishing quick wins in building trust, which over time could build up to more ambitious actions within the OGP process. The process would also benefit from reestablishing a dedicated multi-stakeholder space for dialogue. Government and civil society could draw on guidance from the OGP Handbook,⁹ experiences from other countries, and the PSC’s review of the EAP¹⁰ to agree on how best New Zealand can continue to advance open government through the OGP process and platform.

¹ Christine Lloyd and Dean Rosson (OGP Secretariat, Public Service Commission), interview by IRM, 16 January 2025.

² “IRM Transitional Results Report: New Zealand 2018–2021” (9 March 2022) Open Government Partnership <<https://www.opengovpartnership.org/documents/new-zealand-transitional-results-report-2018-2021>>; “IRM End-of-

Term Report: New Zealand 2016–2018” (7 March 2019) Open Government Partnership <<https://www.opengovpartnership.org/documents/new-zealand-end-of-term-report-2016-2018>>; “IRM End-of-Term Report: New Zealand 2014–2016” (27 February 2017) Open Government Partnership <<https://www.opengovpartnership.org/documents/new-zealand-end-of-term-report-2014-2016>>.

³ Christopher Luxon, Prime Minister “Forty nine actions for first 100 days” (November 2023) 1 News <<https://www.1news.co.nz/2023/11/29/prime-minister-luxon-reveals-his-49-actions-for-first-100-days>>.

⁴ Lloyd and Rosson, interview.

⁵ “CSOs call on the Minister for the Public Service and Finance to adequately fund Open Government Partnership work” (13 May 2024) New Zealand Council for Civil Liberties <<https://nzcccl.org.nz/csos-call-for-dedicated-ogp-funding>>.

⁶ “New Zealand’s future approach to open government partnership” (20 December 2023) Public Service Commission <<https://www.publicservice.govt.nz/assets/DirectoryFile/Report-New-Zealands-future-approach-to-the-Open-Government-Partnership.pdf>>.

⁷ “CSOs call on the Minister for the Public Service and Finance to adequately fund Open Government Partnership work” New Zealand Council for Civil Liberties; Simon Wright (Trust Democracy NZ and former EAP Member), correspondence with IRM, 10 March 2025.

⁸ Elizabeth Eppel, Peter Hodder, and Girol Karacaoglu “New Zealand Public Sector Leadership in the 21st Century: Challenges and Opportunities” (December 2019) Victoria University of Wellington School of Government <https://www.wgtn.ac.nz/_data/assets/pdf_file/0003/1935147/SOGWP2021-1-Public-Sector-Leadership-in-21st-Century-.pdf>.

⁹ “OGP National Handbook,” Open Government Partnership (3 April 2025) <<https://www.opengovpartnership.org/national-handbook/>>.

¹⁰ Allen + Clark “Assessment of Multi-Stakeholder Forum/Platform approaches” (18 December 2024) Public Service Commission <<https://www.publicservice.govt.nz/assets/Allen+-+Clarke-Multi-Stakeholder-Forum-and-Platform-report-final-20.10.23-redacted.pdf>>.

Section II. Early Results

This section analyses commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers the commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time. Annex I analyses implementation of all other action plan commitments.

Table 1. Commitments with Early Results

Commitment 1: Adopt a community engagement tool: This commitment improved government agencies' community engagement practices by releasing a new edition of the Policy Community Engagement Tool and forming a community of practice for the agencies.

Commitment 1: Adopt a community engagement tool

Implementer: The Public Service Commission | Te Kawa Mataaho

Context and objectives

This commitment aimed to assist all public service agencies in adopting the Policy Community Engagement Tool (PCET). Initially produced in 2021 under the previous action plan, the tool offers practical guidance for policy teams and their agencies to conduct inclusive, respectful, and meaningful community engagement.¹ During the implementation period, the Public Service Commission | Te Kawa Mataaho (PSC) did not introduce a model standard or reporting requirements for the use of PCET as originally planned. However, the Department of Prime Minister and Cabinet did publish a second edition of the PCET and a Community of Practice was established to promote its adoption.

Early results: Moderate

The new edition of PCET was published in October 2023.² The update incorporated lessons learned from its use in engaging community groups affected by the terrorist attack on two Christchurch mosques in March 2018.³ PSC stated that PCET was used by 16 agencies to engage many stakeholders by 2024.⁴ However, Kapuia—the diverse community forum formed to advise on ministerial responses to the attack—was disbanded in 2024,⁵ as per its terms of reference. Compared to its first edition, which focused on policy development, the new tool broadened its scope to include implementation and government service delivery. It also offered more advice on engaging previously underrepresented voices in the community.

A government Community of Practice was established to enhance public sector capability for community engagement (in common with Commitment 2). According to the PSC, it includes approximately 160 government members.⁶ It held periodic meetings throughout 2023, incorporating participation of the Māori community and relevant CSOs, such as the Citizens Advice Bureau. For example, in November 2023, a full day was devoted to sharing experiences on engaging with and partnering with Māori.⁷ However, following the November 2023 elections, spending and priority reviews resulted in no further Community events taking place in 2024.⁸ Meanwhile, the External Collaboration Hub Online (ECHO) was introduced by Inland Revenue to facilitate secure collaboration for government members of the Community. Agencies use the hub to exchange civic engagement information and tools relating to stakeholder frameworks, templates, engagement capability-building, stakeholder relationship management, communications, research, behavioural change, and Te Tiriti of Waitangi. According to PSC, this

enables government agencies to better understand counterparts work programmes and collaborate on initiatives where there is a common interest or joint stakeholders.⁹ Relevant resources remain publicly accessible on the website of the Department of the Prime Minister and Cabinet for departments to utilise.¹⁰

The commitment did not introduce a model standard or reporting requirements on the use of PCET. CSOs were not consulted about this decision, although some believe a standard would have been crucial for ensuring more systematic use of PCET.¹¹ By the end of the implementation period, uptake of the tool remained not mandated or tracked.

However, there is anecdotal evidence that the PCET strengthened community engagement during emergency events throughout the implementation period. Following Cyclone Gabrielle in February 2023, the PCET informed government agency responses in Tai Tokerau/Northland and East Coast/Hawke’s Bay. For instance, the Northland and Maraekākaho local authorities held community consultations to shape regional recovery plans. As a result, the Northland government noted that its regional recovery plan prioritised keeping the community at the centre of recovery efforts, contrasting with previous plans that primarily focused on government-driven infrastructure rebuilding.¹²

The PSC also published case studies on earlier PCET use in policy improvement programmes at the national level, such as enhancing the driver licencing system,¹³ and in critical incident responses involving communities as well as local- and national-level government, such as the Pike River Mine explosion and Whakaari/White Island volcanic eruption.¹⁴ These case studies can help others draw on past experiences when applying PCET to new contexts.

Altogether, the updated PCET, the establishment of the wide-ranging Community of Practice, the deployment of ECHO, and the publication of case studies are steps towards enhancing and sharing government community engagement practices. However, since the commitment did not result in a model standard, civil society stakeholders emphasised the need for continued action to achieve the commitment’s broader objective of establishing consistent community engagement practices across all agencies.¹⁵

Looking ahead

Moving forward, New Zealand could enhance oversight of government community engagement practices by making such initiatives a standard area of reporting in annual review documents submitted by government agencies. This approach could establish an expectation of effective community engagement in significant government projects. Additionally, the PSC could publish an overview of community engagement practices to provide further transparency and guidance. Mandating the use of PCET, continuing to strengthen the Community of Practice, and actively including CSOs are additional steps that could reinforce and enhance engagement practices.

¹ “IRM Transitional Results Report: New Zealand 2018–2021” (9 March 2022) Open Government Partnership <<https://www.opengovpartnership.org/documents/new-zealand-transitional-results-report-2018-2021>>.

² “Guide to Inclusive Community Engagement” (October 2023) Department of the Prime Minister and Cabinet <<https://www.dPMC.govt.nz/sites/default/files/2023-10/policy-project-community-engagement-inclusive-guide-oct23.pdf>>.

³ “Royal Commission of Inquiry into the Terrorist attack on Christchurch Masjidain” (12 August 2024) Department of the Prime Minister and Cabinet <<https://dPMC.govt.nz/our-programmes/national-security/royal-commission-inquiry-terrorist-attack-christchurch-masjidain>>.

⁴ Public Service Commission, pre-publication comments, 29 May 2025.

⁵ “Government won't progress remaining 8 recommendations of Christchurch terror attack commission” (2 August 2024) RNZ News <<https://www.rnz.co.nz/news/national/523941/government-won-t-progress-remaining-8-recommendations-of-christchurch-terror-attack-commission>>.

⁶ See “New Zealand’s Fourth National Action Plan (2023–2024) Progress Reports” in “New Zealand's National Action Plans” (accessed 18 April 2025) Public Service Commission <<https://www.publicservice.govt.nz/system/open-government-partnership/plans-and-resources/new-zealands-national-action-plans>>.

⁷ Sacha Green (Citizens Advice Bureau), interview by IRM, 7 February 2025; “Cross Government Stakeholder Community of Practice Post Event Summary 22nd November 2023” shared by Christine Lloyd (OGP Secretariat, Public Service Commission), correspondence with IRM, 22 January 2025; “Community Engagement” (accessed 25 January 2025) Public Service Commission <<https://www.publicservice.govt.nz/publications/community-engagement>>; “Deliberative processes – Citizens’ juries assemblies and citizens’ assemblies” (11 December 2024) Public Service Commission <<https://www.publicservice.govt.nz/publications/community-engagement>>.

⁸ Christine Lloyd and Dean Rosson (OGP Secretariat, Public Service Commission), interview by IRM, 16 January 2025; Christine Lloyd (OGP Secretariat, Public Service Commission), correspondence with IRM, 22 January 2025.

⁹ Christine Lloyd (Public Service Commission) correspondence with IRM, 12 June 2025.

¹⁰ “Policy Methods Toolbox Community Engagement” (accessed 18 March 2025) Department of Prime Minister and Cabinet <<https://www.dPMC.govt.nz/our-programmes/policy-project/policy-methods-toolbox/community-engagement>>.

¹¹ Andrew Ecclestone (Council for Civil Liberties), correspondence with IRM, 13 February 2025.

¹² “Cyclone Gabrielle Stories of Community Resilience” (1 September 2023) Northland Regional Council <<https://www.nrc.govt.nz/resource-library-summary/plans-and-policies/civil-defence/cyclone-gabrielle-stories-of-community-resilience>>; “Maraekākaho Community-led Recovery Conversation Cyclone Gabrielle” (February 2024) Hastings District Council <<https://www.hastingsdc.govt.nz/assets/Document-Library/Community-Plans/Community-led-Recovery-Conversations/Maraekakaho-Feb-2024.pdf>>.

¹³ See “The Driver Licensing Improvement Programme” NZ Transport Agency Waka Kotahi in “Community Engagement” Public Service Commission.

¹⁴ “Model standards: Working with survivors” (accessed 19 January 2025) Public Service Commission <<https://www.publicservice.govt.nz/guidance/model-standards-working-with-survivors>>; “Whakaari / White Island Event Response” (accessed 20 March 2025) Whakatane District Council <<https://www.whakatane.govt.nz/services/civil-defence-emergency-management/emergency-management-updates/whakaari-white-island>>.

¹⁵ Simon Wright (Trust Democracy and former EAP Member), correspondence with IRM, February 2025; Andrew Ecclestone (New Zealand Council for Civil Liberties), correspondence with IRM, February 2025.

Section III. Participation and Co-Creation

The co-creation process started with constructive engagement between the government and civil society. However, communication breakdowns eventually led to some CSOs withdrawing before the conclusion of the action plan period. The implementation process did not meet the minimum requirements of the OGP Participation and Co-Creation Standards.

OGP in New Zealand

The Public Service Commission | Te Kawa Mataaho (PSC) serves as the lead government agency for the Open Government Partnership (OGP) in New Zealand. Operating under the Public Service Act 2020,¹ the PSC is guided by the duty “to foster a culture of open government.”²

The PSC consulted an Expert Advisory Panel (EAP)³ comprising six civil society experts in open government and community engagement. While the EAP held an advisory capacity, it did not have a decision-making role. The EAP’s term concluded in June 2023, after which it ceased to exist. Efforts were made to establish a more enduring multi-stakeholder forum (MSF) for New Zealand.⁴ During the first half of 2023, the consulting firm Allen + Clarke undertook preliminary work to develop the MSF. By the end of the action plan cycle, no action resulted from the Allen + Clarke work and their report was made available to CSOs and the public in December 2024.⁵

OGP work faced budget constraints during the implementation period as the new government reduced spending. The PSC and the five government departments leading commitments resourced their OGP work from departmental baseline budgets without receiving additional, dedicated resources. CSOs involved in the process also resourced their own participation, while EAP members were compensated by the PSC for their time.⁶

Progress on OGP was communicated to the public via the Open Government Partnership New Zealand portal at ogp.org.nz. This site provided details on the co-creation process, including advance notice of participation opportunities. It served as an enduring, accessible repository for records of both the action plan’s development and implementation, as well as public access to current and past action plans and reports.

Action plan co-creation

The PSC made significant efforts to gather input for the action plan from a diverse range of individuals and CSOs across the country. The PSC, government agencies, and the EAP met at least every six weeks throughout the plan’s co-creation period (2020–2022). Approximately a dozen CSOs participated in workshops to develop and prioritise the commitments, which were subsequently refined by the PSC with advice from the EAP. The PSC finalised the action plan and its commitments, presented them to the minister for cabinet agreement, and obtained approval in December 2022. The final plan included two CSO proposals (Commitments 1 and 3) and reflected two of the proposals’ policy areas in less ambitious commitments (Commitments 7 and 8). It also incorporated three government proposals (Commitments 4, 5, and 6) and one jointly developed commitment (Commitment 2). The co-creation process met the minimum requirements of the OGP Participation and Co-Creation Standards.⁷

While CSOs reported positive initial co-creation efforts, frustrations emerged later in 2022 at the end of co-creation due to gaps in communication. During this time, the PSC noted constraints from requirements for cabinet agreement on the action plan and the operational needs of government commitment holders.⁸ It reflected that the co-creation process may have implied a promise of a greater level influence to participants than was realised.⁹ Although some CSOs

withdrew from the OGP process as a result of these frustrations, eight continued to support implementation.¹⁰ CSOs raised the need for wider participation, particularly through involving representatives of the Māori communities.¹¹

Participation during implementation

Civil society had limited opportunities to participate directly in the implementation of commitments. While government agencies responsible for commitments reported initial plans to involve civil society stakeholders through consultation and advisory processes,¹² two CSOs reported that these plans were not evident in practice.¹³

While there were opportunities for civil society to participate in overseeing the OGP process during 2023, participation declined thereafter. The EAP met monthly until June 2023, and the PSC organised two six-month progress review events during the year. These activities allowed CSOs and members of the public to engage with and provide input to the agencies responsible for commitments. In 2024, the PSC published two progress reports and invited questions or comments via the OGP website. However, it did not hold at least two OGP meetings with civil society during the second year of implementation. In comparison, during the previous action plan cycle, New Zealand had quarterly EAP meetings and progress reports.¹⁴ Implementation of New Zealand’s fourth action plan did not comply with minimum requirements 1.1 and 5.1 of the OGP Participation and Co-Creation Standards, which require the establishment of a multistakeholder space for dialogue that meets at least every six months, and the hosting of at least two meetings every year with civil society to present implementation results and collect comments.¹⁵

While eight CSOs endeavoured to remain involved during the implementation period, more had withdrawn by the end of the action plan cycle. Only five of these civil society partners responded to IRM requests for comments.¹⁶ Nonetheless, these CSOs remained willing to support the intended reforms of the commitments through channels outside the OGP platform.¹⁷ For example, Transparency International New Zealand continued to advocate for the anti-fraud and corruption actions of Commitments 4, 5, and 6 via its newsletters.¹⁸

Table 2. Compliance with Minimum Requirements

The IRM uses the OGP Participation and Co-Creations Standards to assess countries’ participatory practices throughout the action plan cycle.¹⁹ Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.²⁰ Due to a grace period, a country’s failure to comply with the minimum requirements does not currently have implications for their OGP status.

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: The Expert Advisory Panel (EAP) concluded its term in June 2023. Appointed and chaired by the Public Service Commission Te Kawa Mataaho (PSC), the EAP comprised six civil society individuals. The EAP’s terms of reference are available on the Open Government New Zealand portal. ²¹ During the early stages of the implementation period, the EAP convened five times to review the action plan’s progress and explore options for establishing an MSF. ²² However, after June 2023, New Zealand remained without an OGP space for dialogue for the remainder of the implementation period.	Yes	No
2.1 OGP website: The Open Government New Zealand portal (ogp.org.nz) served as a dedicated platform for the OGP process. It	Yes	Yes

provided advance notice of participation opportunities, maintained a record of past events, and tracked implementation progress. It also hosted the latest action plan and six-monthly progress reports.		
2.2 Repository: The OGP New Zealand portal contained a repository of information on both the development and implementation of the action plan. The repository was updated at least twice in 2023 and 2024 and contained six-monthly progress reports on the action plan. While information about participation and co-creation was evident during the development stage, it was less prominent during implementation. Reports on the progress of individual commitments sometimes contained this information. ²³	Yes	Yes
3.1 Advanced notice: See the Action Plan Review. ²⁴	Yes	<i>Not applicable</i>
3.2 Outreach: See the Action Plan Review.	Yes	<i>Not applicable</i>
3.3 Feedback mechanism: See the Action Plan Review.	Yes	<i>Not applicable</i>
4.1 Reasoned response: See the Action Plan Review.	Yes	<i>Not applicable</i>
5.1 Open implementation: The PSC held two progress report-back sessions in 2023. These provided the participants with opportunities to seek further information about progress, share comments, and ask questions to the lead implementing agencies. However, this process was discontinued in 2024. Instead, progress reports were posted on the OGP website, with an option to submit questions by email for answers to be later posted on the website. Notification about the availability of these reports was inconsistent, leaving CSOs and the public with incomplete information regarding the OGP process.	<i>Not applicable</i>	No

¹ Public Service Act 2020, <<https://www.legislation.govt.nz/act/public/2020/0040/latest/LMS106159.html>>.

² Public Sector Act, 2020, s12 1 (d).

³ “Governance” (accessed 19 January 2025) Public Service Commission

<<https://www.publicservice.govt.nz/system/open-government-partnership/governance>>.

⁴ Open Government Partnership Review (18 December 2024) Public Service Commission

<<https://www.publicservice.govt.nz/publications/open-government-partnership-review>>.

⁵ Allen + Clark “Assessment of Multi-Stakeholder Forum/Platform approaches” (18 December 2024) Public Service Commission <<https://www.publicservice.govt.nz/assets/Allen+-+Clarke-Multi-Stakeholder-Forum-and-Platform-report-final-20.10.23-redacted.pdf>>.

⁶ Christine Lloyd (OGP Secretariat, Public Service Commission), correspondence with IRM, 11 February 2025.

⁷ “IRM Action Plan Review: New Zealand 2022–2024” (27 July 2023) Open Government Partnership

<<https://www.opengovpartnership.org/documents/new-zealand-action-plan-review-2022-2024>>.

⁸ Dean Rosson and Christine Lloyd (OGP Secretariat, Public Service Commission), interview by IRM, 16 January 2025; “Briefings to Minister for the Public Service” (15 February 2024) Public Service Commission

<<https://www.publicservice.govt.nz/assets/DirectoryFile/Report-Further-advice-on-New-Zealands-future-approach-to-the-Open-Government-Partnership.pdf>>.

⁹ “New Zealand’s Fourth Open Government Partnership Plan Self-Assessment Report 2025” (5 June 2025) Open Government Partnership New Zealand <https://www.publicservice.govt.nz/system/open-government-partnership/plans-and-resources/new-zealands-national-action-plans>>.

¹⁰ “CSOs call on the Minister for the Public Service and Finance to adequately fund Open Government Partnership work” (13 May 2024) New Zealand Council for Civil Liberties <<https://nzcccl.org.nz/csos-call-for-dedicated-ogp-funding>>.

¹¹ The Environment and Conservation Organisations of New Zealand Inc., pre-publication comments, 29 May 2025.

¹² Dean Rosson, Cathy Adank, and Tula Garry (Lead for Commitments 1 and 2, Public Service Commission) interview by IRM, 8 February 2023; Robert Jordan and Lucy Hewson (Lead for Commitment 7, Ministry of Justice) interview by IRM, 9 February 2023; Wendy Hamilton et al. (Lead for Commitment 8, Statistics New Zealand) interview by IRM, 22 February 2023; Tessa Houghton (Lead for Commitment 3, Department of Internal Affairs) interview by IRM, 27 February 2023; Kate Rockpool (Lead for Commitment 4 and Principal Advisor, Serious Fraud Office) interview by IRM, 17 February 2023; Thomas Abernethy (Lead for Commitment 5 & Senior Policy Advisor, Ministry of Business, Innovation,

and Employment) interview by IRM, 20 February 2023; Liz Palmer and Olaf Buhrfein (Lead for Commitment 6, Ministry of Business, Innovation, and Employment) interview by IRM, 22 February 2023.

¹³ Simon Wright (Trust Democracy and former EAP Member) correspondence with IRM, February 2025; Andrew Ecclestone (New Zealand Council for Civil Liberties) correspondence with IRM, February 2025.

¹⁴ “IRM Transitional Results Report: New Zealand 2018–2021” (9 March 2022) Open Government Partnership <<https://www.opengovpartnership.org/documents/new-zealand-transitional-results-report-2018-2021>>;

¹⁵ “IRM Guidelines for the Assessment of OGP’s Minimum Requirements” (May 2022) Open Government Partnership <https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf>.

¹⁶ In December 2024, the IRM requested comments from 12 civil society individuals and organisations that had been active in the OGP process in the period 2022–2024, but only five responded.

¹⁷ Green, interview.

¹⁸ “Newsletter” (accessed 31 March 2025) Transparency International New Zealand

<<https://www.transparency.org.nz/newsletter>>.

¹⁹ “OGP Participation and Co-Creation Standards,” (accessed 18 April 2025) Open Government Partnership

<<https://www.opengovpartnership.org/ogp-participation-co-creation-standards>>.

²⁰ “IRM Guidelines for the Assessment of OGP’s Minimum Requirements” Open Government Partnership.

²¹ “New Zealand Open Government Partnership Expert Advisory Panel Terms of Reference” (September 2018) Open Government Partnership New Zealand <<https://ndhadeliver.natlib.govt.nz/webarchive/20250318091511/https://ogp.org.nz/open-government-partnership/expert-advisory-pane/>>.

²² See “Meetings Papers and Updates” (accessed 5 February 2025) in “New Zealand Open Government Partnership Expert Advisory Panel Terms of Reference” Open Government Partnership New Zealand.

²³ “Check Progress” (accessed 31 March 2025) Open Government Partnership New Zealand

<<https://ndhadeliver.natlib.govt.nz/webarchive/20250318091511/https://ogp.org.nz/check-progress>>.

²⁴ “IRM Action Plan Review: New Zealand 2022–2024” Open Government Partnership.

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive

results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:

- improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Elizabeth Eppel and reviewed by Mary Francoli, IRM external expert. The IRM methodology, quality of products, and review process are overseen by the IRM’s International Experts Panel (IEP).³ For more information, refer to IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹ For definitions of OGP terms, such as co-creation and promising commitments, see “Glossary” (accessed 18 April 2025) Open Government Partnership <<https://www.opengovpartnership.org/glossary>>.

² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses “Potential for Results” and “Early Results” at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

³ “International Experts Panel” (accessed 18 April 2025) Open Government Partnership <<https://www.opengovpartnership.org/about/who-we-are/international-experts-panel>>.

⁴ “Independent Reporting Mechanism” (accessed 18 April 2025) Open Government Partnership <<https://www.opengovpartnership.org/irm-guidance-overview>>.

⁵ “Glossary” Open Government Partnership.

Annex I. Commitment Data¹

Commitment 1: Adopt a community engagement tool	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: Moderate
This commitment is assessed in Section II.	
Commitment 2: Research deliberative processes for community engagement	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate
<p>Under this commitment, the Public Service Commission Te Kawa Mataaho (PSC) researched two examples of deliberative democratic processes, incorporating input from the Expert Advisory Panel (EAP). The PSC published reports evaluating citizens assemblies held for Watercare Auckland and Wellington City Council’s respective ten-year plans.² Wellington City Council viewed this positively, and is considering using the method again, according to an official at the Council. The official further noted that numerous councils, central government agencies, and research institutions in New Zealand and abroad have expressed interest—suggesting that the commitment’s reports could support the implementation of citizens assemblies elsewhere.³ The milestone on identifying future deliberative processes was not explicitly completed. However, the Policy Community Engagement Tool (PCET) was utilised to guide responses to several emergency events (See Commitment 1).</p>	
Commitment 3: Establish an inclusive, multi-channel approach to the delivery of government information and services	
<ul style="list-style-type: none"> ● Verifiable: No ● Does it have an open government lens? Yes ● Potential for results: Unclear 	<ul style="list-style-type: none"> ● Completion: Not Started ● Early results: No Notable Results
<p>This commitment intended to improve offline access to government services, particularly when limited options for non-digital participation exist. However, the Department of Internal Affairs did not advance the commitment, citing resource constraints and conflicting priorities.⁴ Prior to the implementation period, the reform had been championed by the Citizens Advice Bureau (CAB), supported by a petition to parliament based on 4,000 CAB client interactions.⁵ Despite disappointment over the lack of progress, the CAB remains willing to invest its time and resources to collaborate with the Department towards achieving the objectives of this commitment moving forward.⁶</p>	
Commitment 4: Design and implement a National Counter Fraud and Corruption Strategy	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results

<ul style="list-style-type: none"> ● Potential for results: Modest 	
<p>This commitment planned to introduce a National Counter Fraud and Corruption Strategy. However, during the implementation period, progress stalled at the developmental phase. The Serious Fraud Office (SFO) attributed this to fiscal constraints and shifts in justice sector priorities.⁷ As of December 2024, the new minister had yet to give direction on next steps or timelines.⁸ Transparency International New Zealand (TINZ) raised concerns about the increased corruption risks stemming from the failure to advance this strategy, particularly as the government pursues a business growth agenda.⁹ Trust Democracy NZ, the New Zealand Council for Civil Liberties, and the Environment and Conservation Organisations of New Zealand Inc also echoed these concerns.¹⁰ TINZ continues to advocate for reform, underscored by the findings of its 2024 research into New Zealand’s anti-corruption institutions.¹¹ New Zealand ranks in the top five of the Corruption Perceptions Index (CPI), although its score has seen a decline over recent years.¹²</p>	
<p>Commitment 5: Increase transparency of beneficial ownership of companies and limited partnerships</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Substantial 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: No Notable Results
<p>This commitment aimed to introduce legislation to enhance transparency around the beneficial ownership of companies and limited partnerships. In August 2024, the cabinet approved the government’s policy decisions and legislation instructions, including a provision for a unique identifier for all company directors. However, the cabinet chose not to include a provision for a publicly available register of beneficial owners.¹³ By the end of the implementation period, the legislation had not yet been introduced to parliament. TINZ underscored the ongoing need for a publicly available beneficial ownership register to support anti-corruption efforts.¹⁴</p>	
<p>Commitment 6: Improve government procurement transparency</p>	
<ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest 	<ul style="list-style-type: none"> ● Completion: Limited ● Early results: Moderate
<p>Under this commitment, the Ministry of Business, Innovation, and Employment (MBIE) updated the Government Electronic Tender Service (GETS) to include supplier organisation information and codify the reasons why a tender was not selected.¹⁵ Procurement award notices on GETS account for a small percentage of the total annual government expenditure.¹⁶ The MBIE also initiated steps to develop a digital data platform to centralise government procurement data, although the platform was not piloted during the implementation period. With support from the Open Contracting Partnership, the MBIE defined data disclosure formats and laid the groundwork for future releases adhering to the Open Contracting Data Standard (OCDS).¹⁷ The ministry developed an Integrated Systems Plan and formulated an approach to transform current services into the platform.¹⁸ It also launched ‘Ready Buy’¹⁹ to guide agency buyers in navigating procurement resources.²⁰ It remains unclear whether non-government stakeholders were involved in this commitment. TINZ and the New Zealand Council for Civil Liberties</p>	

expressed continued interest in advancing the reforms but were not engaged by the MBIE.²¹ Once completed, the platform initiated under this commitment has the potential to expand the publication of government procurement information in the longer term. According to PSC and the Open Contracting Partnership, efforts related to the platform and OCDS remain ongoing.²²

Commitment 7: Strengthen scrutiny of Official Information Act exemption clauses in legislation

- | | |
|--|---|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Complete ● Early results: No Notable Results |
|--|---|

This commitment focused on strengthening scrutiny of proposed legal clauses in new legislation that exempt certain government information from the Official Information Act (OIA) 1982.²³ All milestones were successfully completed.²⁴ The Ministry of Justice (MOJ) reviewed the relevant processes and guidance—receiving nine submissions on the use of exemption clauses, which were subsequently published on the Open Government portal.²⁵ Following this review, the Ministry reported that it amended its processes and guidance to better reflect the presumption of government information disclosure and the application of the public interest test under the OIA. In 2024, the Ministry disseminated the updated processes and guidance while maintaining its review of exemption clause usage.²⁶ This included writing to members of the Tier 2 Policy Leaders' Network to draw the attention of public service deputy chief executives to the revised guidance.²⁷ However, civil society expressed concerns that these steps did not widen access to information.²⁸ During the implementation period, the Environment and Conservation Organisations of New Zealand Inc. did not observe improvements to exemption clauses in bills relevant to its mandate.²⁹ Civil society groups recommended taking stronger measures, such as introducing mandatory procedures for agencies to follow.³⁰ Regarding stakeholder engagement, they also critiqued the commitment's involvement of an overly narrow group of CSOs in its review.³¹

Commitment 8: Improve transparency and accountability of algorithm use across government

- | | |
|--|--|
| <ul style="list-style-type: none"> ● Verifiable: Yes ● Does it have an open government lens? Yes ● Potential for results: Modest | <ul style="list-style-type: none"> ● Completion: Substantial ● Early results: Moderate |
|--|--|

Building on the previous action plan, this commitment supported the implementation of the Algorithm Charter, which sets voluntary standards for the safe and ethical use of algorithms in the public sector. Stats NZ formed an Algorithm Charter Community of Practice for the charter's government signatories and applicants to exchange information, experiences, challenges, and practices. Between June 2023 and July 2024,³² the community held five meetings, and the PSC reported that it continued to meet quarterly as of December 2024.³³ In addition, in December 2023, Stats NZ published a high-level phased plan to implement recommendations from the December 2021 review of the Algorithm Charter's first year.³⁴ However, resource constraints limited its envisaged engagement with stakeholders during the plan's development and implementation of some recommendations.³⁵ Also in December 2023, Stats NZ released the Algorithm Assessment Toolkit to aid agencies in making informed decisions about the

benefits and risks of algorithm use.³⁶ A review by Salinger Privacy highlighted the toolkit’s strengths in comparison with fourteen other AI Risk Assessment frameworks across New Zealand and Australia.³⁷ In 2024, the Organisation for Economic Co-operation and Development (OECD) recognised the toolkit in its Catalogue of Tools and Metrics for Trustworthy AI.³⁸ In February 2025, the GCDO issued new guidance for agencies considering or utilising generative AI tools, developed in collaboration with technical experts from universities and government agencies.³⁹ Altogether, this commitment marked positive steps in building a framework for responsible algorithm use. For instance, in July 2024, the NZ Police published policy guidance on adopting and using new technologies, including AI, and remains a contributor to the GCDO’s effort to produce a policy framework for AI adoption.⁴⁰ Stats NZ advised that it was not aware of any agencies having published completed Algorithm Impact Assessments as of June 2025, which was recommended when algorithms were identified as higher risk.⁴¹ Moving forward, responsible algorithm and generative artificial intelligence use remains an area of ongoing work across the government, involving GCDO, Stats NZ’s Centre for Data Ethics and Innovation, other government agencies, and academic experts.⁴²

¹ Editorial notes:

1. Commitments’ short titles may have been edited for brevity. For the complete text of commitments, see Public Service Commission “New Zealand’s Fourth National Action Plan 2023–2024” Open Government Partnership <<https://www.opengovpartnership.org/documents/new-zealand-action-plan-2022-2024-december>>.
2. For more information on the assessment of the commitments’ design, see “IRM Action Plan Review: New Zealand 2022–2024” (27 July 2023) Open Government Partnership <<https://www.opengovpartnership.org/documents/new-zealand-action-plan-review-2022-2024>>.

² “Wellington City Council Citizens Assembly” (17 July 2023) Wellington City Council <<https://wellington.govt.nz/news-and-events/news-and-information/our-wellington/2023/07/citizen-assembly>>; “Citizens’ Assembly has say on shaping city’s future” (November 2023) Wellington City Council <<https://wellington.govt.nz/news-and-events/news-and-information/our-wellington/2023/11/citizens-assembly-report>>; “Citizens’ Assembly Long-term Plan 2024–34 Advice to Council” (October 2023) Wellington City Council <<https://wellington.govt.nz/-/media/news-and-events/news-and-information/news/files/2023/longterm-plan-citizens-assembly-report.pdf?la=en&hash=30AC185E047BEB5B56FF25B696DDCAFB9E661B3>>.

³ Lexy Seedhouse (Manager Council Engagement, Wellington City Council) and Rebecca Matthews (Councillor, Wellington City Council), correspondence with IRM, 24 March 2025.

⁴ See “New Zealand’s Fourth National Action Plan (2023–2024) Progress Reports” in “New Zealand’s National Action Plans” (accessed 18 April 2025) Public Service Commission <<https://www.publicservice.govt.nz/system/open-government-partnership/plans-and-resources/new-zealands-national-action-plans>>.

⁵ “Campaign for Inclusion” (accessed 26 January 2025) Citizens Advice Bureau <<https://inclusioncampaign.cab.org.nz/our-mahi>>.

⁶ Sacha Green (Citizens Advice Bureau) interview by IRM, 7 February 2025.

⁷ “Annual Report 2023–24” (accessed 18 March 2025) Serious Fraud Office <https://www.sfo.govt.nz/assets/Uploads/SFO-Annual-Report-2023-2024_digital-final.pdf> [38].

⁸ “New Zealand’s Fourth National Action Plan (2023–2024) Progress Reports” Public Service Commission.

⁹ Julie Haggie (Chief Executive Officer, Transparency International New Zealand) correspondence with IRM, 9 February 2025.

¹⁰ Simon Wright (Trust Democracy and former EAP Member) correspondence with IRM, February 2025; Andrew Ecclestone (New Zealand Council for Civil Liberties) correspondence with IRM, February 2025; the Environment and Conservation Organisations of New Zealand Inc., pre-publication comments, 29 May 2025.

¹¹ Simon Chapple “An assessment of the effectiveness of anti-corruption institutions in New Zealand in deterring, detecting and exposing corruption to NZ Parliament” (11 August 2024) Transparency International New Zealand <<https://www.transparency.org.nz/blog/the-effectiveness-of-anti-corruption-institutions-in-new-zealand>>.

¹² “Corruption Perception Index 2025” (updated July 2024) Transparency International <<https://www.transparency.org/en/countries/new-zealand>>.

- ¹³ “Modernising the Companies Act 1993 and making other improvements for business” (accessed 7 February 2025) Ministry of Business, Innovation, and Employment <<https://www.mbie.govt.nz/dmsdocument/28989-modernising-the-companies-act-1993-and-making-other-improvements-for-business-minute-of-decision-proactiverelase-pdf>>.
- ¹⁴ Julie Haggie “We need a beneficial ownership register now” (7 November 2024) Transparency International New Zealand <<https://www.transparency.org.nz/blog/we-need-a-beneficial-ownership-register-now>>.
- ¹⁵ “New Zealand’s Fourth National Action Plan (2023–2024) Progress Reports” Public Service Commission.
- ¹⁶ Laurence Millar “Four Years of Open Procurement Data” (7 September 2023) Transparency International New Zealand <<https://www.transparency.org.nz/blog/four-years-of-open-procurement-data>>.
- ¹⁷ Nanda Sihombing (Senior Program Manager, Open Contracting Partnership) correspondence with IRM, 2 April 2025.
- ¹⁸ “New Zealand’s Fourth National Action Plan (2023–2024) Progress Reports” Public Service Commission.
- ¹⁹ “About Us” (accessed 21 March 2025) New Zealand Government Procurement <<https://www.procurement.govt.nz/about-us/#ready-buy>>.
- ²⁰ “New Zealand Government Procurement Ready Buy is now live” (accessed 27 January 2025) New Zealand Government Procurement <<https://www.procurement.govt.nz/about-us/news/nzgp-ready-buy-is-now-live>>.
- ²¹ Ecclestone, correspondence; Haggie, correspondence.
- ²² “New Zealand’s Fourth Open Government Partnership Plan Self-Assessment Report 2025” (5 June 2025) Open Government Partnership New Zealand <https://www.publicservice.govt.nz/system/open-government-partnership/plans-and-resources/new-zealands-national-action-plans>>; Sihombing, correspondence.
- ²³ Official Information Act 1982 <https://www.legislation.govt.nz/act/public/1982/0156/latest/DLM64785.html?search=ts_act%40bill%40regulation%40deemedreg_Official+Information+Act_resel_25_a&p=1>.
- ²⁴ “2024 Transparency and Scrutiny of Executive Action: Open Government Partnership” (accessed 10 February 2025) Ministry of Justice <<https://www.justice.govt.nz/justice-sector-policy/regulatory-stewardship/regulatory-systems/constitutional/transparency-and-scrutiny-of-executive-action>>.
- ²⁵ “Commitment 7 – Ministry of Justice Consultation and Guidance” (accessed 16 April 2025) Open Government Partnership New Zealand <<https://ndhadeliver.natlib.govt.nz/webarchive/20250318091511/https://ogp.org.nz/latest-news/commitment-7-ministry-of-justice-consultation>>.
- ²⁶ “Transparency and scrutiny of executive action” (accessed 19 March 2025) Ministry of Justice <<https://www.justice.govt.nz/justice-sector-policy/regulatory-stewardship/regulatory-systems/constitutional/transparency-and-scrutiny-of-executive-action>>.
- ²⁷ “Letter to Policy Leaders Network: Protecting the integrity of the Official Information Act 1982” (accessed 10 February 2025) Ministry of Justice <<https://www.justice.govt.nz/assets/Documents/Publications/Letter-to-Tier-2-Policy-Leaders-Network-Protecting-the-integrity-of-the-Official-Information-Act-1982.pdf>>.
- ²⁸ Sam Sachdeva “Government’s ‘abject failure’ on secrecy clauses” (18 December 2024) Newsroom <<https://newsroom.co.nz/2024/12/18/govts-abject-failure-on-secrecy-clauses>>.
- ²⁹ The Environment and Conservation Organisations of New Zealand Inc., pre-publication comments, 29 May 2025.
- ³⁰ Sam Sachdeva “Government’s ‘abject failure’ on secrecy clauses” (18 December 2024) Newsroom <<https://newsroom.co.nz/2024/12/18/govts-abject-failure-on-secrecy-clauses>>.
- ³¹ “Secrecy clauses that override the Official Information Act” (17 March 2024) New Zealand Council for Civil Liberties <<https://nzcccl.org.nz/secrecy-clauses-that-override-the-official-information-act>>; Sam Sachdeva “Govt’s shadowy work on secrecy clauses criticized” (8 March 2024) Newsroom <<https://newsroom.co.nz/2024/03/08/govts-shadowy-work-on-secrecy-clauses-criticised>>.
- ³² “Blog” (accessed 26 February 2024) New Zealand Government <<https://data.govt.nz/blog>>.
- ³³ “New Zealand’s Fourth National Action Plan (2023–2024) Progress Reports” Public Service Commission.
- ³⁴ “Charter Implementation Plan” (21 December 2023) New Zealand Government <<https://data.govt.nz/toolkit/data-ethics/government-algorithm-transparency-and-accountability/charter-implementation-plan>>.
- ³⁵ “New Zealand’s Fourth National Action Plan (2023–2024) Progress Reports” Public Service Commission.
- ³⁶ “Algorithm Impact Assessment Toolkit” (accessed 28 January 2025) New Zealand Government <<https://data.govt.nz/toolkit/data-ethics/government-algorithm-transparency-and-accountability/algorithm-impact-assessment-toolkit>>.
- ³⁷ Anna Johnston and Emily McGufficke “Moving at the speed of light – which AI risk assessment framework should you use?” (21 October 2024) Helios Salinger <<https://heliossalinger.com.au/blog/insights/ai-risk-assessment-framework>>.
- ³⁸ “Catalogue of Tools and Metrics for Trustworthy AI” (accessed 28 January 2025) Organisation for Economic Co-operation and Development <<https://oecd.ai/en>>.
- ³⁹ Ali Knott and Andrew Jackson (Victoria University of Wellington) correspondence with IRM, 4 February 2025.
- ⁴⁰ Andrew Chen, New Zealand Police “Seminar on trial or adoption of new policing technology” (26 March 2025) Victoria University of Wellington; “Trial or adoption of new policing technology - Police Manual chapter” (July 2024) New Zealand Police <<https://www.police.govt.nz/about-us/publication/trial-or-adoption-new-policing-technology-police-manual-chapter>>.

⁴¹ Christine Lloyd (Public Service Commission) correspondence with IRM, 12 June 2025.

⁴² Wendy Hamilton and Emma Macdonald (Statistics New Zealand) interview and correspondence with IRM, March 2025.