



## **Submission of Taituarā regarding the interim report *A Fair Chance for All***

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### ***What is Taituarā?***

Taituarā — Local Government Professionals Aotearoa thanks the Productivity Commission for the opportunity to submit regarding its interim report *A Fair Chance for All (AFCA)*.

Taituarā — Local Government Professionals Aotearoa (formerly the NZ Society of Local Government Managers) is an incorporated society of approximately 1000 members drawn from local government Chief Executives, senior managers, and council staff with significant policy or operational responsibilities. We are an apolitical organisation. Our contribution lies in our wealth of knowledge of the local government sector and of the technical, practical, and managerial implications of legislation.

Our vision is:

*Professional local government management, leading staff and enabling communities to shape their future.*

### ***While a national issue, the effects of persistent disadvantage are experienced in local communities.***

*“Disparities that were already challenging societies are now expected to widen—51 million more people are projected to live in extreme poverty compared to the pre-pandemic trend, at the risk of increasing polarization and resentment within societies.”*

World Economic Forum, Global Risks Report 2022

Taituarā welcomes the publication of AFCA and the need for an inquiry into persistent disadvantage and whether the public sector settings support or impede an effective response.

Taituarā responds because we consider that there is considerable opportunity for improvement in the way both central and local government operate individually and collectively as a system. Persistent disadvantage is far from the only 21<sup>st</sup> century challenge. Climate change and the transition to a low-carbon future and affordable housing are just two. There is a strong inequity lens to be placed over each.

AFCA correctly notes that the local government sector has a broad statutory purpose “to promote the social, economic, environmental and cultural wellbeing of the community, in the present and for the future”.<sup>1</sup> That is to say, local government, like central government is in the ‘business’ of promoting community wellbeing. It is, however, like central government not always good at measuring its performance in delivering against its well-being mandate.

Local government’s knowledge of, and connection to, local communities are both enablers that are a valuable contribution to any policy debate, or to the design and delivery of local services. The impacts of persistent disadvantage are experienced locally. Issues such as crime and homelessness often have their roots in disadvantage and go to the roles local authorities expect the sector to play whether it be in the delivery of services or acting as an advocate on behalf of the community or a broker of solutions. For example, it’s instructive that the newly elected Mayor of Rotorua has singled out the city’s shortage of housing as her number one priority.

We’d also suggest that there is an interregional aspect to disadvantage. There are a number of reasons for this. First, and most obviously, there is the performance of regional economies and the lack of a coherent national strategy for regional development. . Industries or sectors die or decline with little in their place. Second, it is fair to say that the overall thrust of government policy since the mid-1980s has been to experiment with greater centralisation and agglomeration at scale.

Although local authorities in this country do not have access to the same responsibilities or sets of levers that central government has to address persistent disadvantage, local government is not without tools to assist breaking down persistent disadvantage. It also has a clear mandate to be an advocate and convenor of agencies on behalf of its communities. Some of the key policy and service delivery tools available to local authorities include:

- the provision of the network infrastructure to support affordable housing, and in conjunction with community infrastructure (such as libraries and parks) ensure living is not only affordable but rewarding The same infrastructure supports economic growth and transformation objectives. This also raise the question of equity, how it is defined and how you might use it to address the inequities that exist both within and between different regions

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<sup>1</sup> Section 10, Local Government Act 2002.

- acting as an advocate on behalf of the community for resources to address the causes and impacts of persistent disadvantage (we'll return to this theme later – for now we cite joined up housing initiatives in Hastings, Rotorua, Hutt, and Tauranga as examples)
- working to promote social cohesion and inclusion through actively bringing different perspectives to the table (and listening to what they say when they get there)
- providing or ensuring provision of effective public transport as a cheap alternative to the private car
- designing of remission and other concessionary schemes to provide for accessibility of some services
- promoting a living wage for council employees (and more controversially for those who work with local authorities)
- some meeting of needs that central government policy and/or agencies have otherwise passed by. For example, some rural councils remit rent/rates on buildings to bring in general practitioner or dental services

Therefore Taituarā has been doing a great deal of thinking about community wellbeing and equity in its ongoing contribution to the Future for Local Government Review. Our conclusions about the role of the future system of local governance echo many of the conclusions that are reached in AFCA.

We noted that a “.. *true shift in intergenerational wellbeing requires a whole-of-system approach that:*

- *creates the conditions for all people and places to thrive*
- *is collaborative and long term*
- *recognises, grows, and strengthens what is already in place and is working*
- *shares power, expertise, evidence (of all kinds), and learns*
- *solves problems preferably before they happen*
- *is transparent and accountable”.*<sup>2</sup>

In other words, a system focused not only on what things are done to meet the needs of the communities it serves, but on how things are done, to ensure that the right things get done to reduce inequities and achieve the desired outcomes. The system as a whole also needs to ensure that it understands the needs of its different communities and then develops service delivery solutions that differentiate the service provided based on those different needs. We submit that many of these same attributes apply equally to the system settings considered in AFCA.

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<sup>2</sup> Taituarā (2022), People Thriving in Place – Because Everybody Doing Well Matters: A Submission to the Future for Local Government Panel, page 29.

***New Zealand needs a single framework for thinking about and acting to promote wellbeing.***

We concur with the Commission's Mauri Ora approach to wellbeing. It is holistic, outcome focussed and provides a conceptual framework for developing measures for action, monitoring and evaluation. It also has the merits having been developed independently and not necessarily as seen as 'owned' by Government or political party, and thus gives the framework a longer 'shelf life' (i.e. one that lasts through changes of government)

It concerns us that there are a multiplicity of competing frameworks in the policy space – the Commission's, the Treasury's Living Standards Framework, and the four wellbeings of the Local Government Act. While this is a reflection of the dates that each of these were developed, debates about how to think about inequality and inequities and how to measure and address both have the potential to distract from action. Having said that it is also important that there be one consistent framework applied across the wider public sector including central and local government.

The existence of competing frameworks manifests itself in planning and action. We noted the Commission's comment in Box 6.6 that there are 221 Government department strategies in operation. We also concur with the conclusions of the McGuinness Institute (also cited in Box 6.6) that these are fragmented and overall hinder progress. We'd add that this is characteristic of areas beyond poverty and inequity. It's perhaps also a reflection of the siloed nature of the policy process, and the incentives to short-termism.

The Department of Prime Minister and Cabinet (DPMC) has an overall role in ensuring coordination of policy and service delivery across Government (acknowledging the primacy of the Executive). DPMC has a role in assisting agencies to improve the overall quality of their advice to the Executive. Early thoughts on implementation and funding of a strategy in development might also provide an earlier 'check/balance' on the mushrooming of strategy.

We submit that this should include assisting agencies to provide robust advice as to when and where developing a strategy is a suitable instrument. It should also include a stronger role in assisting the Executive to be more upfront in setting out its overall priorities in a joined up-way.

The Commission is right to be exploring The Wellbeing in Wales Act as a model. While there will never be anything approaching a political consensus on means and values, the so-called Welsh model has provided for a degree of bi-partisanship in agreeing upon the ends (i.e. wellbeing objectives). This provides some degree of consistent overall policy direction.

The Wellbeing in Wales Act also enshrines five ways of working: taking a long-term view, an integrated approach, involving people with an interest in achieving the wellbeing goals, collaboration and preventing problems from occurring or getting worse.

### **Recommendations**

- 1. That the Commission note the policy and service delivery choices that local authorities might make that may address aspects of persistent disadvantage.**
- 2. That the Commission recommend the DPMC take a stronger role in advising Crown agencies regarding effective strategy development.**

### ***Central and local government must think and act in a joined-up fashion to deliver improved community wellbeing***

There is a considerable intersection and interdependence between central and local government. An issue such as affordable housing has many facets (social assistance, the provision of infrastructure, land supply, the availability of skilled labour and materials etc). Of these facets, local authorities can influence only the provision of infrastructure and land supply. Central government has more of a handle on the levers for social development and skilled labour, as well as having a role in infrastructure provision.

So much can be achieved when central and local government work in partnership with others in communities to achieve wellbeing outcomes. AFCA, correctly, notes various programmes and projects developed by the Southern Initiative. These are great examples, to which we add the following drawn from amongst the winners of the Taituarā LGFA Excellence Awards over just the past two years:

- the Hastings District Council Place-based Housing Solution - the result of a conversation between the council, the Crown, iwi, NGOs and social service providers that has tackled an interwoven series of complex housing needs. The solution includes planning, urban design, social service delivery and funding solutions<sup>3</sup>
- [Te Hiku o te Ika Revitalisation Project](#) – the highly successful collaboration between Far North District Council, the Kaitaia Business Association, the five iwi of the Far North’s Te Hiku region and the wider community. The purpose of the

<sup>3</sup> Winner of the 2021 BERL Award for Collaborative Government Action.

project was to create employment in, and enhance the vibrancy of, three of Aotearoa New Zealand's most deprived areas<sup>4</sup>

- ['It's Flaxmere's Time'](#) a revitalisation programme for Hastings District's lowest socioeconomic community, and a means for building trust and engagement between the people of Flaxmere and Hastings District Council. The programme is an amalgam of housing development, parks development, expanded health, wellbeing, and sporting opportunities and social services expansion.<sup>5</sup>

The Covid-19 response provides an example of what cross-sectoral initiatives can be achieve when all sectors are involved. Working in partnership, central and local government were able to co-ordinate and facilitate on the ground welfare and business support responses each playing their role with community partners (with local government leveraging its local connections, infrastructure, and workforce) making it possible to provide support and relief at community level.

In addition to greater attention to establishing a clear, coherent and enduring national strategy, more attention is needed to encourage a whole-of-government system<sup>6</sup> response.

*People Thriving in Place* puts forward a proposed mechanism – we refer to this as the Community Wellbeing Plan (CWP). In effect, CWP is a device for intergenerational community planning for wellbeing, that draws on the contributions of central government, Maori, and NGOs from across the community.

People Thriving in Place further notes

*"(The CWP) provides the framework for Councils, Māori, central government, local communities, and others to develop and formally agree the long-term aspirations and short to medium term plans, actions and investment needed to achieve those aspirations. Local public services are decided, commissioned, and delivered locally by those best placed to achieve maximum wellbeing benefits. In essence, local communities agree what is needed for everyone to thrive in their place and express what this means for them through a long-term Community Wellbeing Plan.*

*Council and Māori would play the anchor role bringing people and information together – making sure that opportunities, issues, and needs are well articulated, so that everyone can have their say where and when they want to, and that a wide range*

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<sup>4</sup> Winner of the 2022 LGFA Supreme Award and the Minister's Award for Excellence in Council/Community Relations.

<sup>5</sup> Winner of the 2022 Beca Award for Placemaking.

<sup>6</sup> It is worth noting that when many central government agencies use the term whole-of-government they generally refer to the Crown and its agencies. We use it to refer to central AND local government and their agencies (including, for example, Council Controlled Organisations).

*of community voices are heard. Local information and data inform local decision-making.*

*Wellbeing agreements between central/local government/Māori (and other key partners) form a fundamental part of the Community Wellbeing Plan. Partners to these joint wellbeing agreements publish their resource investment in Community Wellbeing Plan (Councils) and respective Statements of Intent (SOIs) and longer-term strategies (others) and report results through their respective Annual Reports.*

*We also envisage robust and transparent joint accountability approaches. Taking this approach with partnership agencies increases public transparency and embeds partnerships into operational strategies and actions. It also enables joint reporting on national and local wellbeing outcomes.*

*This form of Community Wellbeing planning aligns well with changes to social services and commissioning for outcomes, the resource management reforms (including proposals for statements of community outcomes and integration with proposed regional spatial plans and natural and built environment plans), locality planning (as established in the Pae Ora Healthy Communities Act 2022) and future water entity planning. "*

CWPs would be supported by a greater empowerment of the Public Sector regional leads. As established, these roles were to support the joining up of central and local perspectives, allow for better communication and building of understanding of the different needs of local communities. In the long-term local communities will expect a greater level of say in the direction central government investment takes and in the design of local services. That will mean some devolution of decision-making to the regional leads.

### **Recommendations**

- 3. That the Commission recommend that central and local government put in place a joint model for intergenerational community planning for wellbeing, along the lines of the Community Wellbeing Plans described in *People Thriving in Place*.**

***There is a need for further investment in developing an agreed framework to assess wellbeing and equity, and (particularly) investment in our collection of statistics.***

The second of the Commission's proposed shifts is to *'refocus public accountability settings to activate a wellbeing approach'*. One of the fundamental tenets of accountability is that *what gets measured, gets done*. An agreed common framework for measuring progress to wellbeing objectives - including measures of equity. This also supports a shift from measuring widgets and dollars to measuring outcomes.

We submit that this requires investment in a broader and deeper range of statistics that measure the wellbeing at community level. While there have been improvements in the collation of regional and territorial level statistics, even statistics at territorial level can be misleading. There can be some degree of 'aggregation beyond meaning'. For example, Auckland has the second highest level of household income on most measures, but this masks one of the largest intra-city differentials in the country consider the respective cases of Remuera and Otara. And its not only a metropolitan phenomenon – consider Far North, and the difference between Hokianga and Paihia/Russell.

Some examples of the places where investment is likely to yield some return on investment include:

- housing demand and supply
- skill development
- regional/territorial economic data at quarterly level.

### **Recommendation**

**4. That the Commission recommend further investment in the deepening and broadening of regional and local statistics.**

### ***Constitutional aspects of the system settings impede the kinds of system response the Commission describes.***

Taituarā considers that the terms of reference have precluded the Commission from considering some of the key barriers to the public sector shifts AFCA describes.

The Commission has rightly identified the predominance of the short-term over the longer term. We agree that the short-term dominates policymaking, service delivery and funding models and even infuses itself into significant elements of the accountability regime.

Short term foci manifest themselves in reporting those items that can be quickly and easily measured, which generally incentivises reporting focussed on inputs and outputs rather than outcomes. We add that political imperatives focus on short-term,



clear demonstrations of success and reporting on matters that are within the portfolio-holders direct control. Again, this lends itself to input/output focused reporting.

While these incentives never wholly disappear in a democratic environment, we submit that lengthening the term of the electoral cycle to four, or even five years would build in more medium-term focus into these processes.

We are well aware that the Commission is precluded from making recommendations for constitutional reform. However, we consider a clearer identification of the constitutional settings as having aided in the creation of the system challenges would lie within the Commission's role as an independent advisor. ranging through to the better seeking and incorporation of the perspectives of the regions in policy design and the design and commissioning of services.

### **Recommendation**

**5. That the Commission include an explicit finding that some aspects of New Zealand's constitutional arrangements may underpin the system challenges identified in the report.**

### ***The capacity for whole-of-government system learning can be enhanced.***

We concur that there is some lack of system leadership for learning, not only in central government, but also in local government. Additionally, there is almost no joined up attempt to jointly develop the public sector workforce beyond the Government Regulatory Practice Initiative (G-Reg) building common competencies in regulatory practitioners.

While the public sector and local government managers and staff have different authorising environments, they are expected to operate to similar values and in a similar manner. Both exist to provide their respective decision-makers with free and frank advice and to implement policy decisions.

The public does not necessarily draw a distinction between central and local government, especially when it comes to the respective workforces.

There is a significant degree of sameness about the types of challenge each workforce is facing. Each is dealing with similar issues with recruitment and retention, especially in the context of an aging workforce. The development of leadership capability is likewise common to both sectors – indeed as a sector we will be

following the restoration of a sector-wide public sector senior executive capability. We will also be watching the development of the leadership strategy and the workforce policy with interest.

Competencies that support the craft of policy advice and advising are common to both sectors – yet there is little attempt to join the professional development responses for both (at least at a government level). These include open government and access to official information; Te Tiriti O Waitangi and working in partnership with Māori; well-being, health, and safety; and diversity and accessibility.

One of the consequences of a failure to take a joint approach to workforce development is a bidding-up of costs. We therefore support development of an overall public sector workforce and skills strategy. Such a strategy would take a long-term view of the skills and competencies necessary to deliver upon all of the advisory and service delivery functions for the sector, in the present and for the future.

The support of the Prime Minister, Minister of Local Government and the Minister of State Services would be critical amongst Ministers. Our previous experience trying to establish and operate a joint forum of Chief Executives in the past also demonstrated that the support and active involvement of the State Services Commissioner is likewise essential. The Commissioner's role as the employer of public service Chief Executives will ensure involvement in this Forum and its work programme are important.

We therefore agree that there is a role for system learning and improvement lead. Logically this should sit with the Public Service Commissioner as the overall system head unencumbered by a particular function or functions. The Commissioner would then establish a board to support him in that role, drawing on senior Chief Executives from within central and local government.

### **Recommendations**

- 6. That the Commission recommend that central and local government jointly develop a public sector workforce and skills strategy.**
- 7. That the Commission recommend that the whole-of-government lead for system learning be assigned to the Public Services Commissioner.**
- 8. That, in pursuing the role assigned in recommendation 7 above, the Public Service Commissioner draw on the advice of a joint central/local board.**

### ***Better evaluation will support whole of system learning***

*"The country needs and, unless I mistake its temper, the country demands bold, persistent experimentation. It is common sense to take a method and try it: If it fails, admit it frankly and try another. But above all, try something."*

President Franklin D Roosevelt, Oglethorpe University Commencement Speech

We agree that the robust evaluation of policy (and its implementation) provides a rich source of learning for the system. We make suggestions below intended to improve the quality and reliability of evaluation as a tool to better enable system learning.

We were unclear whether and how the Commission envisaged that monitoring sat within its treatment of evaluation. The two are strongly linked, as one commentator observes *"Monitoring means keeping track of what you are doing while you are doing it, so that you can take corrective action if necessary. Evaluation means finding out if you have achieved the effect on your target population that you said you would achieve, after you have finished implementing the activities."*

Properly done, monitoring can be a source of system learning as a particular policy or programme is implemented. For example, has an eligibility criterion been too loosely or narrowly defined; is there some aspect about programme delivery preventing programme uptake? Most of the comments we make below about evaluation apply equally to monitoring.

The Government policy and budgetary processes do make some recognition of the need for monitoring and evaluation. For example the regulatory impact statements that accompany policy proposals are required to describe proposed monitoring arrangements. Our understanding is that the same applies to the so-called "budget bid" process. And the last edition of the principles for regulatory responsibility made (by our count) four references to monitoring amongst the guidance.

Our observation of regulatory impact statements are that the sections on monitoring and evaluation are often quite 'light' in their specificity. Coming as they tend to, at the end of the formal documentation they sometimes read to us as though they are the last thing done.

A robust evaluation is, and should be, challenging. The emphasis is on learning and on identifying what has and hasn't worked. If they are to be truly useful as opportunities for system learning, then the public service needs to ensure that these are as free and frank as their policy advice.

Agency heads should be selecting fit for purpose evaluative measures and techniques based on a set of robust criteria. It is fair and proper that Ministers be consulted as these are developed – it is their policy or programme being reviewed. But the final approval of an evaluation strategy (and monitoring for that matter) should *rest with the Agency heads*.

There are a number of measures that could be taken to improve monitoring and evaluation. Guaranteeing the independence of Agency heads in developing the methodologies is one step (though one that will surely be challenging to the Executive). Requiring independent peer review of monitoring and evaluation strategies by subject matter experts “before the fact” would be another. We also consider that the accountability of the Executive to Parliament would be enhanced if all evaluation reports were delivered to the relevant Select Committee formally, and the Committee be asked if it wishes to hear further.

There is a role for system leadership in the monitoring and evaluation space – possibly as a part of the policy head of profession.

### **Recommendations**

- 9. That the Public Service Act be amended to provide the heads of Crown Agencies with statutory independence in developing the methodologies for monitoring and evaluation strategies.**
- 10. That Government policy guidance be amended to require that monitoring and evaluation strategies be peer reviewed independently to the agency.**
- 11. That the Commission further consider system leadership for the monitoring and evaluation function.**

### ***New Zealand is not currently well positioned to introduce or embed anticipatory governance models***

We agree with the sentiment of recommendation 6.7 though we consider the wording could have been framed more assertively.

While some of the policy Ministries undertake occasional foresight projects they are variable in quality. Our experience is that the foresight work tends to be agency

specific rather than cross-sectoral, and as such it tends to have a relatively low level of penetration and not survive the electoral cycles.<sup>7</sup>

We concur with Boston (2016) that New Zealand would benefit from a centralised foresight unit in the public service.<sup>8</sup> We observe that the skills and capabilities in foresight in this country are spread very thinly in the private sector, in academia and in slivers in the public sector. We've taken a lead from Boston and briefly looked into the British, Canadian and Singapore units.

The Singaporean Centre for Strategic Futures provides one possible model. It was formed out of the amalgamation of capabilities spread across several public sector agencies and is located in the Prime Minister's Office. Singapore has a population broadly comparable with New Zealand (5.7 million) though it has an obvious advantage of location close to the bulk of Asia. In addition to the provision of foresight it also has a capability building role in support of its mission statement "*to build a strategically agile public service ready to manage a complex and fast-changing environment*".

Canada's Policy Horizons Organisation offers a second model. It too, is an agency of the central government, a brief review of its website suggests its more of a standalone agency. Its charter appears to explicitly preclude it from publishing commentary on the policy decisions of Government. One interesting feature is that its governing body appears to be a mix of lower level Ministers, second-tier civil servants, with some leaders from think-tanks and NGOs.

We submit that a foresight agency for the New Zealand public sector should be:

- a standalone agency i.e. not located in any existing Crown agency
- charged with both reporting/investigatory and capability building functions
- managed by a Chief Executive who serves a single seven-year term, and is not eligible for reappointment
- required to specifically engage with the Public Service Commissioner, the head of DPMC<sup>9</sup>, Taituarā and Local Government New Zealand in developing its work programme. And empowered to engage with others it considers may have interest in the work programme
- selecting topics based on feedback from stakeholders and the agency's own strategic sensing

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<sup>7</sup> In 1997 and 1998 Local Government New Zealand participated in a scenario led foresight exercise where all departments had been asked to consider what their portfolio interests might look like under scenarios variously described as 'possum in the headlights', 'kauri standing tall'. Despite public engagement and no little participation Ministers lost interest prior to the 1999 election.

<sup>8</sup> Boston (2016), *Anticipatory Governance: How Well is New Zealand Safeguarding the Future*, Public Sector Quarterly, Vol 12 No 3 (2016).

<sup>9</sup> In their capacity as the identified head of the policy profession in central government.

- guaranteed statutory independence as the methodologies it employs (akin to that extended to the Government Statistician – under the Statistics Act 1975).

The short-term, adversarial nature of political discourse stifles consideration of future-oriented policy challenges. Political parties exist because there is often more than one policy approach to an issue, especially those that are more long-term in their nature. But more can be done to identify future challenges and at least build consensus that there is actually a challenge and its size and nature. That is to say that there is a need to take the politics out of foresight.

A Parliamentary Select Committee might be established to focus on the longer-term issues free of the minutiae of legislation and the cut and thrust of debating whose policy solution is best. The Committee should be drawn from Government and non-Government members in equal measure (forcing consensus) and chaired by a senior member of the opposition (though obviously not a party leader).

The Commission should note this is machinery of Parliament issue, not a constitutional one, and as such is not expressly precluded by the terms of reference for the inquiry.

We were interested in the Commission's comments on Long-Term insights Briefings. Those we have read or commented on support the Commission's contention that strategic foresight is in its formative stages. Treasury's was an amalgam of material in its BIM and in the long-term fiscal report. Others tended to be the policy equivalent of 'cold readings' on relatively safe ground (e.g. the Ministry for the Environment chose the importance of land to our wellbeing, the Department of Internal affairs chose technology and participation). While both are worthy subjects, neither the topics in themselves, nor the presentation of them challenged or extended our thinking or offered any new insights.

We add that the engagement on many was scant – it was not uncommon to see drafts open for the public to comment for only two weeks. (Environment went one better by engaging on its draft over the two weeks of a school holiday period).

We suggest that the Office of the Auditor-General conduct a performance audit of the first crop of briefings and how they might better fulfil their purpose. That audit should be undertaken with the assistance of the Public Service Commission.

## **Recommendations**

**12. That the Commission recommend the establishment of a stand-alone public sector foresight agency in its final report.**

**13. In addition to recommendation 6, that the Commission consider the merits of, and operating principles for, a Parliamentary Select Committee on futures.**

**14. That the Commission recommend that the Office of the Auditor-General undertake a performance audit of the first set of long-term insights briefings including whether these have met their purpose, and how they might be improved.**

***A step change in accountability is necessary both in central and local government.***

Accountability is a given in a democratic system of government, though sometimes treated as a piece of compliance or a burden by those who have to prepare the necessary information and front the meetings. Accountability is a demonstration to the community that public agencies are using their powers in an efficient, effective and proper manner.

All are important but the Commission's report strongly implies that the present regime is oriented to demonstrating efficiency and probity. We still see strong elements of output-based reporting (we completed project x, we produced x widgets) as opposed to reporting against outcomes. That is equally as true of local as central government.

We agree that there is a need for an overall functional/system lead for accountability. We agree that this is not a role for the Office of the Auditor-General, they need to remain independent, and this may also infringe upon their role in not commenting on policy. Treasury also has the skillsets – perhaps more so than other organisations. However this may not fit with their other role as the chief stewards of the Government's accounts (it may be akin to asking a fox to design the security arrangements for the chicken coup).

We also thought of an independent office. While we have some attraction to this, a lead for accountability would need a strong policy function and some 'weight' in the legislative process. The best overall 'fit' we could identify as a division within the Public Service Commission.