



AUGUST REPORT

3 September 2025

TSOC-MAG 25/06

Hon. Casey Costello, Minister of Customs and Associate Minister of Police

LEADING THE FIGHT AGAINST ORGANISED CRIME

KEY MESSAGES

- ▶ Accountability is a critical part of an effective response to organised crime. All parts of the transnational serious organised crime system should know what they are expected to do and be held accountable for doing it.
- ▶ Many instances of prevention, response, investigation, and prosecution across the system demonstrate that agencies all have high levels of capability and commitment in their areas of focus. Nothing we say in this is intended to detract from that.
- ▶ But due to a lack of cohesion, our current system response to organised crime is not supporting those involved in the response in the way that it should. Nor is it holding to account those who are not meeting expectations. It needs to, if we are serious about responding to the threat of organised crime.
- ▶ To drive this cohesion, we recommend establishing a Minister who is accountable for TSOC functions to lead the fight against organised crime.
- ▶ The responsible Minister and agencies should be supported by a dedicated oversight function to drive cross-agency performance and prioritisation, monitor success and ensure accountability.
- ▶ To support performance monitoring, a TSOC Maturity Model should be developed, building on work already carried out as part of the 2020-2025 TSOC Strategy. The TSOC Maturity Model should involve constant evaluation and assessment of performance.
- ▶ Private sector businesses in high-risk industries should also be supported to ensure that they are not contributing to organised crime and held to account if they fail to do so.
- ▶ New Zealand also needs to hold itself to account for creating and implementing a coordinated action plan to assist our international neighbours and partners to disrupt organised crime before it reaches our shores.

Steve Symon
Chair, Ministerial Advisory Group

WE NEED TO UP OUR ACCOUNTABILITY GAME

1. The five reports that the Ministerial Advisory Group has delivered so far have made wide-ranging recommendations for how New Zealand can improve its response to the emerging threat posed by transnational, serious organised crime (organised crime).
2. For that response to be effective, it is critical that those who play a role in the response are held accountable for doing so.
3. Accountability is a broad term that is used to capture a range of different expectations. At its core, accountability means being answerable for actions.
4. Four key aspects of accountability underpin our recommendations in this report:
 - a. Those who will be held accountable need to know what they are expected to do – they need to know the standard that they will be held to.
 - b. The government needs to create an environment that enables those expectations to be met, through culture, leadership, legislation and resourcing.
 - c. There must be mechanisms for monitoring performance.
 - d. And there must be incentives for those who meet expectations, along with consequences for those who fall short.
5. The importance of accountability in this context cannot be overstated—it is fundamental to effective governance and performance improvement:
 - a. When performance is clearly defined, monitored, and evaluated, it is possible to identify areas for improvement and optimisation.
 - b. Accountability mechanisms strengthen coordination among stakeholders, which is essential for effective service delivery.
 - c. Accountability builds trust and transparency by ensuring that agencies are answerable for their actions and decisions, and are seen to be answerable. It reduces the risks of corruption, negligence, and arbitrary decision-making, which in turn enhances the collective impact of agency resources and encourages and empowers the community to assist the government response.
6. People across a range of sectors, industries and roles are working hard to play their part. But the system is not optimising their work in the way that it should. Nor is it holding to account those who are not meeting expectations. It needs to, if we are serious about responding to the threat of organised crime. A focus on accountability is consistent with expectations the government is setting for driving improvements across the public service to deliver better outcomes for New Zealanders.¹

¹ The Public Service Commission is leading this change by activating the Public Service around priorities, efficiency and fiscal consolidation and focusing on capability and performance. Public Service Commission (2024) [He Takunetanga Rautaki Strategic Intentions 2024/25 – 2027/28](#), p 4.

7. The response to organised crime involves six critical tiers of accountability:
 - a. **Political accountability:** Top tier accountability and prioritisation mechanisms at a Cabinet / Ministerial level.
 - b. **Agency accountability:** Accountability mechanisms within enforcement and other public service agencies at both a leadership and operational level.
 - c. **Systems and performance monitoring:** System-wide performance measurement mechanisms and continuous improvement processes.
 - d. **High-risk sector accountability:** Setting expectations for how businesses in high-risk sectors can assist with the fight against organised crime.
 - e. **Community responsibility:** Our communities need to understand how they can contribute toward the response to organised crime.
 - f. **Transnational accountability:** The government must be accountable for creating and implementing a co-ordinated action plan to assist our international neighbours and partners to disrupt organised crime before it reaches our shores.
8. Issues with accountability were a consistent theme that arose during our interviews. Our current settings are wanting across each of these accountability tiers:
 - a. There is no single, direct Ministerial-level accountability for responding to organised crime. That has resulted in a lack of consistency, an absence of prioritisation and a lack of cohesion across the remaining tiers.
 - b. An absence of accountability mechanisms for enforcement and public sector agencies has resulted in a lack of prioritisation, a lack of understanding about the available resources and tools and a culture of risk-aversion within some agencies.
 - c. There are insufficient systems mechanisms to monitor performance of our response. While some good work has been done to identify and understand the problem, more is needed to understand the risks and how a cohesive approach can respond effectively. One of the primary reasons for the Ministerial Advisory Group being established was to drive this critical understanding.
 - d. As discussed in our June and July reports, there is a need for greater awareness within our communities and for information sharing with critical private sector industries. And there needs to be a means of measuring what is being done, what is working and what is not, so education campaigns can be targeted and resources can be most effectively allocated.
 - e. As we said in our April report, while New Zealand delivers a range of support through its International Development Cooperation programmes which build institutional capacity, they are not directly targeted at the threat of organised crime. There is a lack of coordinated accountability across these and other work programs targeted at preventing organised crime before it reaches our shores.
9. Our recommendations in this report are designed to address each of these critical tiers to ensure that we have cohesive and unified accountability mechanisms across our entire response to the threat of organised crime.

A LACK OF CLEAR ACCOUNTABILITY

10. Organised crime is a national security threat. It directly impacts New Zealand's national security interests.² And the threat is growing. New Zealand should be regarding it as the number one national threat and responding accordingly. That is not happening.
11. The Transnational Organised Crime Strategy 2020–2025 (TNOC Strategy) outlines a range of initiatives designed to align priorities, policies, and legislative frameworks to support agencies in disrupting and preventing organised crime. The vision of the TNOC Strategy is for:

New Zealand to be the hardest place in the world for organised criminal groups and networks to operate.

12. Five years on, methamphetamine availability is at unprecedented levels. Social and economic harms from organised crime, including drugs, fraud, migrant exploitation and cybercrime have never been higher. Despite substantial efforts made as part of the TNOC Strategy, organised crime continues to thrive. We need to aim higher, and we need to ensure that those involved in the response are held to account.

We don't have a clear mandate about who is responsible for what

13. Aligning government machinery to combat organised crime is inherently complex. It requires prioritisation, coordination and action. This will only be achieved if people and agencies are driving action and being held accountable for delivering results.
14. Currently, at least thirteen different Ministerial portfolios each hold some responsibility for delivering the TNOC Strategy's desired outcomes. Despite the existence of the National Security Strategy and the TNOC Strategy, which both emphasise co-ordination between agencies, we have seen ongoing challenges in fusing operational priorities to deliver a response that optimises the resources, legislative tools and information sharing powers we have available. Organised crime is sophisticated and adaptive. Our coordination efforts at all levels are fragmented and lack agility.
15. Accountability must be enforced across all points which intersect with organised crime. Critically, it must be improved among key agencies, both in relation to accountability for coordinated policy development and for carrying out operational activities. Only when all parts of government work cohesively can New Zealand collectively protect and enhance the social and economic wellbeing of its citizens. This leadership and coordination must be driven at the Ministerial level to deliver the required cohesion across the whole TSOC system.

We don't collaborate

16. A significant consequence of insufficient accountability is a lack of clarity around effective and targeted use of resource. Cohesion is straight forward where objectives align with agency goals, but it can get far more challenging where objectives diverge.
17. Ministerial priorities heavily influence 'current state' agency action. If disrupting organised crime is not seen as a political priority, agencies are less likely to allocate resources or focus attention on it. Cultural barriers within agencies, such as a belief

² New Zealand Government (2023) [Secure Together – New Zealand's National Security Strategy 2023-2028](#), p. 28.

that organised crime is outside their mandate,³ also hinder cross-sector collaboration and accountability. This fragmented approach, with a lack of accountability for how limited resources are used in relation to organised crime, results in a less than optimal use of those resources. It also inhibits our ability to assess whether we are getting good returns on the investments we are making.

18. This is compounded by siloed information structures, in which agencies hold more data than they share externally, limiting transparency and hampering coordination efforts. For example, the TNOC Fusion Centre, which is supposed to be an intelligence centre supported by representatives from different agencies, has faced significant challenge in obtaining resource from partner agencies so Police have had to step up and fund the staffing required. This reflects poorly on a system with high reliance on intelligence.

We don't follow through

19. New Zealand has been responding to a generational problem with short term solutions.
20. We need to have follow through on our plans and commit to long-term strategies to avoid failure through continual shifting of the goal posts. Some staff in agencies have observed to us that they spend more time writing plans than seeing them through due to constantly shifting priorities.
21. Over the years, the government has launched various initiatives to improve coordination and disrupt organised crime. An example is the Organised and Financial Crime Agency of New Zealand (OFCANZ), which was established in 2008 with the intention of consolidating enforcement efforts. However, it was later merged into the Police as the National Organised Crime Group, and its broader system-level ambitions were never fully realised.
22. These efforts were well-intentioned, but they lacked the sustained leadership, governance, and accountability needed to drive system-wide change. We cannot, as a country, afford to repeat these mistakes. We need to approach the problem differently—think wider, be bolder, and ensure the right accountability mechanisms are in place to succeed.

And we don't know whether we are succeeding

23. Like all complex systems, it is challenging to measure the impact of solutions. In particular, it is difficult to:
 - a. Quantify the immediate social harm costs of organised crime.⁴
 - b. Measure the intangible and long-term harms of organised crime, such as eroded trust in institutions and intergenerational impacts.
 - c. And measure prevention impacts – that is, whether particular responses, individually or collectively, have meaningfully disrupted or deterred organised crime.

³ For example, at times MBIE and IRD have seen themselves as having a range of more important priorities.

⁴ Australia has recently estimated the costs of serious and organised crime in 2022/23 to be around \$AU30.4b and \$AU67.8b. See Russell Smith (2024) [*Estimating the costs of serious and organised crime in Australia, 2022–23*](#). Statistical Report no. 50. Canberra: Australian Institute of Criminology.

24. These challenges are recognised in the TNOC Strategy. Developing an integrated performance measurement framework was identified as a priority action to understand both the scale and impact of organised crime, and the effectiveness of intervention actions.⁵ The objective was to tell the overall story of system performance.
25. Through the TSOC Strategy, work was undertaken in 2021 to develop an agreed set of performance measures across the system. However, agencies reported that they were unable to source and provide the data needed to adequately populate the framework.
26. This led the TNOC Steering Group to decide to shift the approach away from a quantitative model towards a more qualitative assessment of the system's ability to address and mitigate the risks associated with organised crime. This manifested in a Maturity Model Framework (TSOC Maturity Model) that was developed to help to prioritise areas for improvement and to refine overall system strategies.
27. Significant work was put into the TSOC Maturity Model in 2021 and 2022. However, due to resource constraints and movements in the national security space, it was not followed through to completion, and the work remains in draft.
28. The TSOC Maturity Model, if appropriately resourced, developed and maintained, would provide a useful performance measure. But the fact that development of the model has stalled in the way it has is indicative of the current lack of accountability for assessment of performance and results in the fight against organised crime.
29. The net result is that we are not in a position to fully or accurately assess progress made against the performance expectations set in the TNOC Strategy. We do not know if we are succeeding or not. This is unacceptable.
30. The organised crime response is not alone in facing these difficulties. It is challenging to broaden the focus to horizontal accountability – that is, accountability across a range of different actors working together side by side rather than in a command structure. Similar challenges are faced when measuring system-wide responses to other complex issues such as family violence and sexual violence (such as those currently being addressed by the Centre for Family Violence and Sexual Violence Prevention). There are solutions – but they require a targeted prioritised approach that must be led from the top.

No matter how imperfect or distasteful, we must be willing to put a value on serious and organised criminal harms, exactly in the way we do with other global security threats. Too often politicians avoid attaching a price to abuse and exploitation as it highlights the scale of what is happening to the public and the media. But if we're serious about resourcing a meaningful and sustainable response, we can no longer afford to look away. Influence, funding and political attention follow data. A serious response must follow the same logic.

Sir Stephen Kavanagh, DCMG, QPM, DL
Secretary General of the International Centre for Missing and Exploited Children, and
former Executive Director of Police Services at INTERPOL⁶

⁵ New Zealand Government (2020) [Transnational Organised Crime in New Zealand: Our Strategy 2020 – 2025](#), pp. 19 – 20.

⁶ Tony Blair Institute for Global Change (2025) [A New International Approach to Beating Serious and Organised Crime](#), p. 5.

WE NEED TO TAKE CONTROL

31. To fix the problems with accountability, we recommend in this report steps to embed accountability within the six key tiers, namely:
 - a. political accountability
 - b. agency accountability
 - c. systems and performance monitoring
 - d. critical sector private business accountability
 - e. community responsibility
 - f. transnational accountability.
32. Implementing the recommendations in this report will ensure that we have a cohesive national framework under which:
 - a. everyone knows who is responsible for doing what
 - b. there is an environment that enables those responsibilities to be met; and
 - c. those who do not fulfil their responsibilities are held to account.
33. Instilling clear accountability will also foster public trust and, in turn, increase the expectations that can be placed on communities and the private sector to step up to the plate and take responsibility for their own roles in the response.
34. We recognise that many instances of prevention, response, investigation, and prosecution activities demonstrate that agencies all have high levels of capability and commitment in their areas of focus. Nothing we say is intended to detract from that. New Zealand should be very proud of the integrity and commitment of our enforcement agencies. These recommendations are about helping them to be better. Because we cannot, as a country, afford to be speaking to this same problem again when designing a new strategy in five years.

Political accountability

35. Accountability starts at the top. A whole-of-government response starts from the Cabinet table.
36. We recommend:
 - a. designating to a Minister the responsibility for driving the development and delivery of our response to organised crime (responsible Minister); and
 - b. creating a dedicated function to support the responsible Minister to deliver on the refreshed TNOC Strategy.
37. The responsible Minister would take a horizontal view across the enforcement, economic regulation and social sector portfolios to drive concerted action at the policy and operational levels.

38. In other countries that we have looked at, Ministerial responsibility for organised crime sits within wider portfolios, such as Justice and Security.⁷ For the reasons we have explained, our view is that the threat is significant enough to justify distinct and focused Ministerial responsibility. We are uniquely positioned to do so, as we do not face some of the complexities that inhibit such an approach in comparable jurisdictions (such as multiple borders or levels of government). There is no reason why New Zealand cannot, through this change, solidify a cohesive programme to effectively combat organised crime.
39. In our view, the importance and the complexity of the problem of tackling organised crime are such that the responsibility could not be incorporated into any of the existing Ministerial portfolios (such as Police, Customs or Justice). In particular, the wide range of types of organised crime, the prevention and enforcement responses required and the need for system-wide cohesion make it inapt for an existing agency-specific portfolio. In our view, the problem demands and justifies an undistracted voice.
40. Key responsibilities of the responsible Minister would be to:
- a. **Prioritise the response to organised crime.** As noted, at least 13 different Ministers currently have responsibility for aspects of the TNOC Strategy. Those Ministers all have competing priorities, and organised crime is not a top priority for any of them. That lack of prioritisation filters down all the way through government. A dedicated responsible Minister could coordinate with other Ministerial portfolios whilst ensuring that organised crime is prioritised as an emerging threat which directly impacts our national security interests and challenges the very fabric of our country.
 - b. **Strengthen legislation.** We have made a range of recommendations in our reports for legislative reform, to improve the ability of enforcement agencies to effectively target organised crime. Legislative amendments for combatting organised crime across a range of different statutes should be consolidated in a single Minister to ensure co-ordination and focus. That Minister should continue to consider improvements to our law. As organised crime evolves, so must our legal response. A responsible Minister is critical to address the current legislative inertia that is costing New Zealand dearly.
 - c. **Centralise and lead policy development.** This is critical to avoid the fragmented and siloed response that we currently face. This would ensure consistency and cohesiveness in policy development, and that critical policy initiatives are not missed. It would enable long-term planning and investment, especially in response to emerging threats. While teams such as the Methamphetamine Sprint Team are working on specific tasks, there is no central entity driving innovation and ambition. Ad hoc working groups lack the necessary effectiveness.

⁷ For example, in the United Kingdom there is a Minister of State for Security and Economic Crime, with responsibility for a number of matters that intersect with organised crime. In Australia, responsibility sits with the Minister for Home Affairs. In Canada, a Minister of Border Security and Organised Crime Reduction was created in 2018, but was abolished 18 months later following criticism that it fuelled an unfounded sense of crisis, conflated border security and organised crime and added further confusion regarding roles and responsibilities. Given the emerging threat of organised crime and the current lack of prioritisation, we do not see any of those criticisms as valid in New Zealand in 2025.

- d. **Hold agencies to account.** Centralised leadership is crucial to consolidate accountability by requiring agencies to justify their performance.
 - e. **Drive development of a culture of accountability amongst agencies.** Good leadership and expectations come from the top. For example, the responsible Minister will be able to drive the culture transformation towards information sharing within government that we recommended in our July report.
 - f. **Improve transparency.** The responsible Minister should be required to report annually to Parliament and to the public (to the extent possible) on the progress made in achieving strategic objectives, ensuring transparency and fostering public trust in the response.
 - g. **Lead public awareness campaigns.** Awareness campaigns are important tools to counter the normalisation of organised crime.
 - h. **Drive targeted social investment.** Social investment is a key aspect of intervention in vulnerable communities to build long-term resilience to organised crime. As we explained in our June report, maximising the effective use of resources and the benefits of social investment requires a mature response built on a framework of prevention through reducing demand. It is not necessarily about obtaining more money, it is about being smarter in how it is spent. The responsible Minister would provide leadership and direction for that framework.
 - i. **Prioritise investment in technology and data analytics tools.** Organised crime is moving at the speed of technology. Responsibility for investment in tools such as the data lake that we recommended in our July report should be consolidated in a single Minister to ensure that we are keeping pace, and to build trust and confidence in the country's declining security efforts.
41. A dedicated oversight function should be set up to support the responsible Minister to drive the refreshed TNOC Strategy:
- a. This oversight function should be small but efficient, equipped with the right tools to monitor and drive cross-agency performance and ensure accountability. It would emphasise the importance of long-term system improvement by promoting transparency, monitoring, and early identification of underperformance.
 - b. The oversight function would also foster interagency collaboration and peer accountability by conducting reviews and using lessons to improve systems. Enforcement agencies conduct high quality investigations and prosecutions, but there are currently limited mechanisms to drive the learnings from these into other agencies and back into a whole-of-government system response to enable increased efficiency and target hardening.⁸
 - c. If implemented effectively, this oversight function would provide a high return on investment, even in the short-medium term. The successes of the Ministerial Advisory Group that we have already seen in enhancing collaboration and

⁸ Target hardening is a crime prevention strategy that focuses on increasing the difficulty for criminals to offend by strengthening the protection for the targets of crime.

motivating underperforming agencies highlights the value of a semi-independent oversight and accountability function.

42. New Zealand has a history of establishing new institutional arrangements to respond to emerging threats. Examples include the establishment of:
 - a. The Serious Fraud Office, to address systemic failures exposed by the 1987 share market crash.
 - b. The Canterbury Earthquake Recovery Authority, to lead and coordinate the response and recovery to the Canterbury earthquakes.
 - c. The Infrastructure Commission as an independent advisor to government on New Zealand's long term strategy for infrastructure.
 - d. The Centre for Sexual Violence and Family Violence, which is leading a whole-of-government response to break the intergenerational cycles.
43. The challenge is however ensuring that the follow through is effective and the responses deliver on the enduring threats they were created to address.
44. We will address how this oversight function should be structured and operationalised in further detail in our September report.

Agency accountability

45. One of the key responsibilities of the responsible Minister will be to hold agencies accountable for performance of their respective roles under the Government's future strategy for organised crime.
46. Agencies will be expected to align their activities with priorities set out in the strategy and demonstrate accountability through the development and implementation of internal policies, codes of conduct, and performance standards. This should be supported by robust mechanisms such as audits, evaluations and reporting processes.
47. It also requires development of an environment in which agencies are supported and enabled to meet the expectations that will be placed on them. Without alignment of expectations and enablement, the system as a whole, risks becoming punitive rather than constructive and collaborative, undermining trust and performance.
48. We recognise that agencies will continue to have competing priorities and must work with the resources that they have at their disposal. We are not proposing a fundamental shift of the core functions of any agency. But there are significant limitations in how agency performance related to organised crime is assessed and upheld. Individual agency audits and evaluations often lack the specificity or scope to adequately measure outcomes relating to organised crime, making it difficult to gauge effectiveness or identify cross-agency improvements at a systems level. The organised crime response falls through the gaps.
49. There is scope to improve how agency chief executives are held accountable for their contributions to system issues, such as organised crime. For example, the Public Service Act is currently being amended to explicitly require the Public Service Commission to consult with appropriate ministers when setting performance

expectations and reviewing their performance.⁹ This will enable the responsible Minister to have greater influence and oversight of a chief executive's performance in relation to organised crime, including for example building in key performance indicators relating to organised crime.

Systems and performance monitoring

50. To ensure system-wide accountability within agencies, there need to be mechanisms to measure and report on performance across the system. This must be driven by a cycle of continuous improvement where there is a clear flow from an agreed strategy and priority set of actions, clear ownership for delivery, and feedback on the results to inform future action.
51. We recommend an approach to systems and performance monitoring that builds on the work already carried out by agencies to develop the TSOC Maturity Model as part of the TSOC Strategy. This needs to be prioritised, developed and improved over time to provide richer insights into the effectiveness of the response to organised crime. As maturity of the model improves, we would expect agencies to be in a better position to address data gaps and provide an integrated view of system performance.
52. Implementing a framework that provides agencies with clear direction as to how they will be measured is crucial, as it means there can be reward for agencies that are performing (through positive reporting to Cabinet and budget outcomes), and converse consequences for the agencies where expectations are not met.
53. This should be supported by regular public reporting on system performance, drawing together relevant system indicators, an overall assessment of the state of the system based on the Maturity Model and delivery of priority actions committed to by agencies.
54. This would reflect successful approaches used in the past, such as the indicators and progress reports prepared by DPMC for the Methamphetamine Action Plan 2009.¹⁰ A current example, is the Ministry of Transport's quarterly reporting on *New Zealand's Road Safety Objectives* which combines key system indicators with progress reporting on key agency commitments and actions.

New Zealand's Road Safety Objectives

Improving road safety is a strategic priority for the Government. Like organised crime, the interventions cannot be directly correlated to long term outcomes. The Government's road safety objectives therefore focus on targeting the highest contributors to fatal road crashes: safer roads, safer drivers, safer vehicles and resetting our approach to speed limits.

The objectives document is focused on achievable actions and resourcing the commitments outlined in the government policy statement on land transport.¹¹ Progress is reported publicly through quarterly performance reports.

⁹ Public Service Amendment Bill, cl 46(1).

¹⁰ DPMC (2011 - 2015) [Methamphetamine - indicators and progress reports](#).

¹¹ New Zealand Government (2024) [New Zealand's Road Safety Objectives](#).

Improving reporting on outcomes within complex systems

55. The challenges we face in reporting on the performance of the system response to organised crime are not unique. In fact, this is a feature of many complex systems where there is no clear link between individual actions and the outcomes sought.
56. The Government has set clear expectations about improving the quality of performance reporting across the public sector. The Finance and Expenditure Committee's inquiry into central government performance reporting includes, for example, how reporting can support focus on outcomes, including equity and the long-term and complex challenges facing New Zealand.¹² This may provide useful guidance to strengthen accountability in the organised crime system.
57. The performance and monitoring system will require a set of clear and well-defined key performance indicators against which the success of the system-wide response can be measured. Expectations of what success will look like can be embedded within these performance indicators. These might include, for example, a target to reduce the financial harm from cybercrime by 20 per cent, or to reduce the supply of methamphetamine by 50 per cent while increasing successful rehabilitation rates for drug users by 30 per cent.¹³
58. The exact performance indicators and expectations will need to be developed by subject matter experts in conjunction with the refreshed TSOC Strategy and as part of the TSOC Maturity Model.
59. In addition, the Office of the Auditor-General has taken a focus on the performance of public organisations in dealing with complex long-term issues similar to organised crime, such as family violence and sexual violence, child poverty, youth justice and housing. We recommend the response to organised crime be a topic in the 2026/27 review programme of the Office of the Auditor-General.¹⁴

Private sector accountability

60. The government, at both Ministerial and agency level, must drive the response to organised crime. But government cannot do it alone. Nor should it.
61. Private businesses in critical high-risk sectors¹⁵ should be responsible for ensuring that they are not facilitating or contributing to the organised crime response. Doing so is in their interests, as organised crime has an economic cost, so businesses benefit when crime is low.
62. But there also needs to be accountability mechanisms to ensure that businesses are doing their bit. This includes:
 - a. Providing assurance over subcontracting arrangements to prevent and detect fraud, including cyber related fraud, money laundering or migrant exploitation.

¹² Finance and Expenditure Committee (11 April 2025) [Select committee begins inquiry into performance reporting and public accountability](#).

¹³ Similar to the nine Government Targets that are currently being used to drive better results for New Zealanders by focusing attention, resources and accountability across the public sector.

¹⁴ See the list of [Topics for 2025/26](#) in Office of the Auditor-General (2025) *Annual Plan 2025/26*.

¹⁵ As set out in our May report, high-risk industries include companies involved in import and export supply chains, immigration advisers, professional facilitators, banks and telecommunication providers.

- b. Reducing corruption.
 - c. Ensuring proactive and consistent reporting of suspicious behaviour.
63. This requires:
- a. Clear legal and regulatory frameworks, so businesses know what they are expected to do.
 - b. An oversight body, to assess whether businesses are doing what is expected.
 - c. Enforcement mechanisms and penalties, to hold them to account if they do not.
64. The dedicated oversight function that we have recommended to support the responsible Minister should also have a role to play in holding critical industry private sector businesses to account. We will discuss that role further in our September report.

Community responsibility

65. The public has a legitimate expectation that government agencies will respond effectively and efficiently to the threat of organised crime, through responsible use of public funds and delivery of results. The public grants the government a "social licence" to act — this must be earned through transparency, effectiveness, and integrity. As part of that social licence, agencies should be held accountable for their engagement with the public to assist our communities to take responsibility.
66. The flipside to the social licence is that the community also has a role to play. In our June report, we identified our communities as key partners in the fight against organised crime. They can only be key partners if they step up and take responsibility. This includes a responsibility to support individuals who are vulnerable to being victims of organised crime (including drug users, exploited migrants and fraud victims) and a responsibility to report suspicious or criminal activity.
67. The Resilience to Organised Crime in Communities (ROCC) programme is well positioned to support oversight of not just the disruption of organised crime, but of a sustainable community led prevention response in the medium-long term:
- a. A Maturity Model is in place to guide improvement – which could be developed to complement the TSOC Maturity Model.
 - b. There has been a clear focus on ensuring that investment decisions are guided by evidence-based approach to investing in outcomes.
68. That is why it is critical to maintain ROCC's position at the interface between organised crime and the social sector network, ensuring alignment with the Social Investment Approach and the continued involvement of Regional Public Service Commissioners.

Transnational accountability

69. New Zealand should be able to demonstrate to our international neighbours and partners that we are an effective ally in the fight against organised crime. We have always been seen by the rest of the world as a safe trade partner and a safe country to visit. Tourism is a crucial industry for New Zealand. Last year, tourism contributed approximately 7.5% of our GDP. If we are not accountable for our response to

organised crime, and if we are not seen to be accountable for it by our trade partners and by the countries where our tourists come from, we risk severe economic impacts.

70. New Zealand also needs to demonstrate the effectiveness of our investments in building capability in the Pacific – both to ourselves and to our partners in the Pacific. In our May report, we recommended that Government work with partners to develop an anti-corruption strategy and review the support offered to the Pacific to focus on projects which address the problems of organised crime. New Zealand invests significant and critical resources overseas to disrupt organised crime before it reaches our shores. We need coordinated and targeted accountability mechanisms to ensure that those resources are being used in a collaborative way, and to ensure that we are getting a return on that investment.

RECOMMENDATIONS

71. We recommend:

- a. establishing a dedicated Ministerial portfolio for transnational serious organised crime
- b. establishing a dedicated oversight function to support the responsible Minister to deliver on the response to organised crime
- c. implementing accountability mechanisms to ensure agencies are being held to account for delivery of the response to organised crime, including:
 - i clear prioritisation
 - ii regular reporting requirements
 - iii leadership incentives
- d. developing and maintaining a TSOC Maturity Model to monitor performance and ensure continuous improvement processes
- e. aligning the TSOC Maturity Model with the ROCC programme to ensure a sustainable community led prevention response in the medium to long term
- f. the response to organised crime be a topic in the 2026/27 review programme of the Office of the Auditor-General
- g. developing mechanisms to hold high-risk private sector businesses to account for supply chain monitoring, reducing corruption and reporting of suspicious behaviour
- h. continuing work with our international partners to disrupt organised crime before it reaches our shores, and to ensure that we are getting a return on investment.