

Working Paper 2025/15

Record of Progress on the Implementation of Recommendations Related to the COVID-19 Pandemic as at September 2025

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1.0 Introduction

1.1 Purpose

The McGuinness Institute has concerns regarding the pace at which recommendations from the Royal Commission of Inquiry and the Office of the Auditor-General (OAG) in relation to the COVID-19 pandemic are being implemented. This working paper is intended to provide a public record that shows the status of implementation of recommendations from key independent reviews. It will be used to support the production and testing of the McGuinness Institute's upcoming *Report 19 – A Decision Tree for Future Pandemics*.

1.2 Purpose of Project PandemicNZ

Project PandemicNZ aims to help New Zealand prepare for future pandemics, by identifying key lessons before they are lost and forgotten. It draws together early Institute publications as well as an increasingly comprehensive suite of research into and publications on the recent COVID-19 pandemic (see a full list of McGuinness Institute *PandemicNZ* publications in Appendix 1).

Pandemics are not uncommon; they are frequent enough to cause major damage while being irregular enough for knowledge not to be passed down through generations. The recent COVID-19 pandemic is the fifth global pandemic in just over a century. Previous pandemics began in 1918, 1957, 1968 and 2009. Improving New Zealand's pandemic preparedness has been a key goal of the Institute since 2005. The occurrence and impact of future pandemics is likely to increase across the world due to climate change and land use changes. The COVID-19 pandemic highlighted gaps in preparedness, both in terms of the health system and supply chains. We must strengthen our capabilities and preparedness so that we are ready for future pandemics.

New Zealand has the opportunity to learn from the COVID-19 pandemic, identifying key lessons that will be beneficial in the long term. It is essential that we review what New Zealand did well, and what can be done to improve our capabilities and preparedness in the future.

1.3 Background

The Institute was first made aware of this issue following the OAG's publication of *Responses to our recommendations about the co-ordination of the all-of-government response to the Covid-19 pandemic in 2020* in June 2024. OAG asked the Department of the Prime Minister and Cabinet (DPMC), the National Emergency Management Agency (NEMA), the Public Service Commission (PSC) and the Ministry of Health (MOH) for an update on their response to recommendations listed in the 2022 report *Co-ordination of the all-of-government response to the Covid-19 pandemic in 2020*.¹ Following the review of responses, the Auditor-General, John Ryan, said in a letter to the finance committee: 'Although these four organisations have worked to implement our recommendations, I expected that more progress would have been made. In my view, New Zealand is not yet prepared for the next major event, and it is still unclear when we will be.'²

This lag between receiving recommendations and actually implementing them is concerning. As Ryan said in his letter, New Zealand was not yet prepared for another event at the same scale as the COVID-19 pandemic. This trend is further illustrated with the publication of MOH's Interim Pandemic Plan in 2024 (the *2024 Plan*). The *2024 Plan* states that it 'does not address the full range of lessons identified during the COVID-19 pandemic'.³ As part of our OIA 2025/11, the McGuinness Institute asked MOH to clarify when these lessons will be addressed.⁴

2.0 Methodology

This section details the methodology for this working paper, as well as any limitations that have been identified.

2.1 Method

This working paper was created using the following three steps.

1. The recommendations of the following five documents were copied into two spreadsheets.

Spreadsheet 1:

- *Lessons from COVID-19 to prepare Aotearoa New Zealand - Consolidated lessons and recommendations for a future pandemic*⁵

Spreadsheet 2:

- *Ministry of Health: Management of personal protective equipment in response to Covid-19*⁶
- *Management of the Wage Subsidy Scheme*⁷
- *Preparations for the nationwide roll-out of the Covid-19 vaccine*⁸
- *Co-ordination of the all-of-government response to the Covid-19 pandemic in 2020*⁹

Columns were made for departments to provide the status of implementation (e.g. whether the recommendation has been fully implemented, partially implemented, not yet implemented, or the department has decided not to implement it), as well as any other general comments that the department has.

In order to have all of the OAG reports in the same table, identifying codes were given to each paper. These codes are below in Table 1.

Table 1: Key for Section 3 and 4

Report	Table it is found in	Code (Column A of Table 2)
Lessons from COVID-19 to prepare Aotearoa New Zealand - Consolidated lessons and recommendations for a future pandemic	Table 1	N/A
Ministry of Health: Management of personal protective equipment in response to Covid-19	Table 2	PPE 2020
Management of the Wage Subsidy Scheme	Table 2	WSS 2021
Preparations for the nationwide roll-out of the Covid-19 vaccine	Table 2	Vaccine 2021
Co-ordination of the all-of-government response to the Covid-19 pandemic in 2020	Table 2	AoG 2022

2. In early September 2025, the Institute sent out an OIA request to MOH, Treasury, the Reserve Bank of New Zealand (RBNZ), the Ministry of Defence (MOD), the Ministry of Social Development (MSD), the Ministry of Business, Innovation & Employment (MBIE), OAG and Inland Revenue (IRD). The OIA requested the departments to fill out the attached spreadsheet, in particular the columns asking for the status of implementation and general comments.¹⁰
3. When these responses were received, they were all combined into the two tables in Sections 3 and 4.

2.2 Limitations

The content of the tables has been supplied solely by the departments OIA responses. There has been no work done by the Institute to verify the accuracy or whether recommendations have been implemented most effectively.

3.0 Phase One of the Royal Commission of Inquiry

Table 2: Implementation of the recommendations of Phase One of the Royal Commission of Inquiry

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
Group 1: Strengthen all-of-government coordination and accountability for pandemic preparedness	1	Establish a central agency function to coordinate all-of-government preparedness to respond to pandemics (and other national risks). The function should: a. Develop, monitor and produce reports on the National Risk Register (see also Recommendation 5a). b. Support the Chief Executives Group (see also Recommendation 4) to oversee a cross-agency work programme to prepare for and respond to pandemics. c. Coordinate the development of a range of pandemic scenarios to guide preparedness and response planning (see also Recommendation 2). d. Develop an all-of-government response plan (see also Recommendation 7) and lead associated preparatory work. e. Coordinate national pandemic response exercises at least once every three years and report on those exercises to the Chief Executives Group and ministers.	Central government				
	2	Ensure the central agency function has access to appropriate scenario planning and modelling capability to support pandemic preparedness and response. That capability should: a. Be drawn from public sector agencies, non-government institutions and the international community. b. Include health, economic and social modelling to allow for the interaction of these components. c. Determine the data and monitoring systems that are needed over the longer term. d. Be able to be surged during a pandemic response.	Central government				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	3	Establish a pandemic expert advisory group, including expertise from both the public and non-government sectors, to support pandemic preparedness and provide strategic advice during a pandemic response.	The central agency function, in consultation with the Ministry of Health and other relevant agencies				
	4	To strengthen oversight and accountability for public sector agencies' preparedness for pandemics (and other national risks): - Establish a Chief Executives Group to have strategic oversight of national preparedness for pandemics (and other national risks) and associated cross-agency work, including the development and delivery of a work programme to address gaps in preparedness. - Create an oversight mechanism such as a Cabinet Committee or Ministerial Group chaired by a senior minister to proactively review national preparedness for pandemics (and other national risks) and oversee a work programme to address gaps in preparedness. - Require the Chief Executives Group to regularly update the Cabinet Committee or Ministerial Group on the extent of preparedness. - Invite Parliament to establish a mechanism to proactively review national preparedness for pandemics and other national risks, on a regular basis. - Set expectations for pandemic preparedness via public service chief executive performance agreements, and via Ministerial direction to Crown entities, including a requirement to work collectively on preparedness. - Invite the Office of the Auditor-General to establish a review and a public reporting programme on the public sector's readiness to respond to pandemics (and potentially other national risks), that includes how they would deliver business-as-usual activity during a pandemic of extended duration.	- Central government - Te Kawa Mataaho/ Public Service Commission for part of recommendation 4e				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
Group 2: Ensure an all-of-government pandemic plan, response structure and supporting processes are developed and ready for a pandemic response	5	To ensure public transparency: a. Publish the National Risk Register and report on actions being taken to address risks, every three years. b. Require public sector agencies to include an assessment of pandemic preparedness in their annual reports.	Central government				
	6	Provide advice on options for sustainably funding the necessary preparation activities and associated systems improvements, as outlined in the recommendations in this report.	The Treasury				
	7	Develop an all-of-government pandemic response plan that includes: a. A statement of the overarching objective of a pandemic response (to be adapted as appropriate depending on the nature of the pandemic). b. Roles and responsibilities for delivering an all-of-government pandemic response. c. Criteria, thresholds and processes for when an all-of-government response will be triggered, instead of a health-led response. d. Key considerations to guide the initial and urgent response, including whether/when to introduce stringent measures that may be required urgently. e. Guidance on how to develop and ensure there are pathways and transitions through all stages of the response through to exit. f. Mechanisms for communication with different communities (including Māori, Pacific and other ethnic communities, disabled people and other groups with specific communication needs). g. Mechanisms for monitoring the social, economic and cultural impacts of a pandemic response, and feeding this back into advice on policy responses. h. A statement of how the pandemic response plan will support the Crown to meet its te Tiriti o Waitangi obligations. i. An explanation of how individual sector plans will work together to ensure a comprehensive response.	The central agency function				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	8	Update the all-of-government pandemic plan following each national pandemic response exercise (see also recommendation 1e).	The central agency function with input from other agencies as required				
	9	Develop an all-of-government response structure that can be quickly stood up in a pandemic where the lead agency does not have the capacity and capability to coordinate the response. Its functions and capabilities when activated should include: a. Leading the all-of-government response. b. Coordinating the development of new legislation. c. Coordinating the provision of expert advice. d. Information systems and processes to support the development of advice to decision-makers (see also recommendation 11). e. Public communication and engagement during the response. f. Processes to rapidly review and strengthen key response arrangements to ensure they remain fit for purpose and can be adjusted to changing circumstances, including operational issues. g. A separate strategy function that has the capacity to lead high-level planning for different phases of the response, including planning for transition and exit.	The central agency function				
	10	Develop a plan to enable the movement of public sector capability and capacity during a pandemic response, including bringing in specific expertise where needed and ensuring that staff can be rotated to reduce the risk of burnout.	Te Kawa Mataaho/ Public Service Commission				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	11	Prepare guidance and templates for producing advice under urgency that takes account of: - The overarching strategic purpose of the response and the ethics frameworks that will be used to balance different rights, values and impacts in decisions. - The impacts on the wider health system and non-health sectors. - The cumulative impacts of decisions to limit the New Zealand Bill of Rights Act 1990 rights and other human rights over time, and how those impacts are assessed. - How long-term implications are considered. - The Crown's obligations under te Tiriti o Waitangi. - The use of tools such as multi-criteria analysis, value for money, and cost benefit analysis to weigh up the relative costs and benefits of choices in a consistent manner.	The central agency function				
	12	Establish processes and accountability mechanisms to protect democratic and human rights during a pandemic response, including: - Enabling cross-party consultation and input, as well as mechanisms that ensure parliamentary scrutiny during a pandemic. - Balancing quick decision-making with transparency, accountability, and maintaining trust and social licence. - Inviting entities with oversight and accountability responsibilities to develop, after consultation with relevant public sector agencies, processes that will enable them to exercise their functions during a pandemic of extended duration.	- Central government for recommendations 12a and 12c - The central agency function on recommendation 12b				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
Group 3: Strengthen the public health measures that may be required in a pandemic	13	Refine the current health system pandemic plan so that it: - Complements the all-of-government plan (see also recommendation 7) and other public sector agencies' planning, and helps identify some of the requirements for both. - Sets out a range of public health strategies (such as elimination, suppression, mitigation), objectives and associated public health and social measures that can be used in responding to a pandemic and provides guidance on how they might be deployed. - For the initial response, identifies key public health considerations to guide advice on whether or when to introduce border restrictions and other strict measures aimed at excluding or eliminating the infectious agent. - Identifies indicators of capacity and mechanisms for surging capacity when needed (in areas such as testing and quarantine). - Provides for pandemic preparedness and resilience in the wider health system, including plans for maintaining access to non-pandemic healthcare (see also recommendation 22). - Includes plans for health communications in a pandemic response – including communication with the government, other government agencies, across the health system (such as healthcare providers) and with healthcare users. These plans should consider mechanisms for communicating effectively with different communities (including Māori, Pacific and other ethnic communities, people with disabilities, and other groups with specific communication needs), as well as business groups and not-for-profit bodies. - Indicates how the health system will support the Crown to meet its te Tiriti obligations in a pandemic response, consistent with the existing frameworks and policies of health agencies, services and providers.	Ministry of Health				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	14	Develop a comprehensive plan for quarantine and isolation measures, that includes: a. Identifying a range of quarantine and isolation options, including a cost-effective and scalable mix of purpose-built, hotel contracts and other facilities, the associated investment required, and how different approaches could work together as an integrated system. b. Options for the allocation of quarantine and isolation capacity in case of limited supply that take account of need and legal rights, and provide for user-friendly and compassionate processes. c. How current and new technology, such as location monitoring of people in home isolation and quarantine, could be used, including as a complement to facility-based quarantine. d. Information-sharing protocols. e. Alignment and integration with the financial support measures to meet welfare and business support needs (see also recommendation 30).	Ministry of Health together with Health New Zealand Te Whatu Ora				
	15	Ensure the health system can rapidly scale-up key public health functions in line with the health system pandemic plan. This includes preparedness to deliver contact tracing, testing, vaccination and guidance on infection prevention and control measures.	Ministry of Health together with Health New Zealand Te Whatu Ora				
	16	Ensure the health system has the information and data capability to deliver a pandemic response by prioritising work to implement the recommendations of the Health and Disability System Review (March 2020) calling for connected and shared health systems, data and information.	Ministry of Health together with Health New Zealand Te Whatu Ora				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	17	Develop a comprehensive plan for the use of international border restrictions which includes consideration of how to manage the impacts on people affected by border restrictions, including: a. Any necessary changes to immigration settings to support foreign nationals in New Zealand. b. Provision of timely social, welfare and financial support to foreign nationals in New Zealand and New Zealand citizens offshore. c. Provision of relevant social, financial and health support to the New Zealand Government's offshore workforce in a future pandemic.	Border Executive Board and Ministry of Social Development				
	18	Develop a comprehensive plan for the use of national and regional lockdowns which includes consideration of: a. The thresholds and circumstances that might justify their use. b. How the impacts on people can be managed, including the work done under recommendations 30 and 32. c. A process for establishing and managing regional boundaries, if required.	Ministry of Health, together with other relevant agencies				
	19	Identify the circumstances in which vaccination requirements (such as occupational requirements, mandates, vaccine certificates or passes) might be recommended as part of a package of public health measures, and key considerations for how the negative impacts of the requirements might be mitigated.	Ministry of Health				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
Group 4: Ensure all sectors are prepared for a pandemic and ready to respond	20	Develop and maintain sector pandemic plans that: a. Complement other sector plans and the all-of-government pandemic response plan (see also recommendation 7). b. Incorporate input from sector stakeholders on gaps or vulnerabilities that need to be addressed ahead of a future response. c. Identify sector-specific key considerations that need to be taken into account when making decisions on the initial response. d. Set out the strategies and options that can be used over the short and longer term, including how they might be deployed. e. Identify roles and responsibilities within each sector for responding to a pandemic. f. Provide mechanisms for surging capacity when needed. g. Identify the workforce needed to support a pandemic response, within a specific sector. h. Include mechanisms to allow sector stakeholders' connections, intelligence and ideas to feed into any response. i. Enable communication with different communities during a pandemic response (including Māori, Pacific and other ethnic communities, disabled people, and other groups with specific communication needs), as well as with business groups and not-for-profit bodies. j. Indicate how they will support the Crown to meet its te Tiriti obligations in a pandemic response.	All public sector agencies				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	21	Alongside the development of their pandemic plans, each sector should consider what activities within their sector might be able to be kept going in a safe way even when public health restrictions are in place, and how such safe activities could be enabled. They should also consider: - What activities might in limited circumstances need to be designated 'essential' during a pandemic response, and what would need to be in place to enable these activities to continue. - How the right balance might be struck between prescriptive rules and flexibility for devolved decision-making for the agencies, businesses and other bodies within their sector, and what guidance and safeguards would be needed to support this.	All sectors				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	22	Plan and ensure system resilience and readiness for continuity of health and disability services during a pandemic, including through: - Guidance on how to prioritise non-pandemic health services in a pandemic and mechanisms to regularly review prioritisation decisions during a pandemic. - Mechanisms for monitoring and reporting on health system performance and capacity to inform decisions during a pandemic. - Planning for, and investment in, workforce capability and resilience for a pandemic. - Building health system resilience into operational policy, commissioning frameworks, service contracting, monitoring and reporting. - Planning for how providers can be supported to adapt their service delivery models in a pandemic to minimise disruption to the ongoing provision of healthcare. - Identifying possible supply chain issues for key pandemic-related products (such as reagents, ventilators, medical products, personal protective equipment) and medicines or medical products, that might arise during a pandemic and prepare a plan that addresses sources of supply, procurement mechanisms, management protocols and contingency measures. - Planning for how to secure adequate physical capacity to meet healthcare needs in a pandemic (such as through the allocation of public hospital capacity, the use of ad hoc and private facilities, management protocols, and other contingency measures).	- Ministry of Health, together with Health New Zealand Te Whatu Ora, Ministry of Social Development as required - Ministry of Health, Health New Zealand Te Whatu Ora, Pharmac and Ministry of Business, Innovation & Employment on recommendation 22f				
	23	Determine the costs and benefits (and associated funding priorities) of improving ventilation in all or parts of hospitals and other healthcare facilities, alongside other interventions designed to manage infection risk in those facilities.	Ministry of Health, Health New Zealand Te Whatu Ora and Ministry of Business, Innovation & Employment				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	24	Review and develop options for improving ventilation and filtration in buildings generally accessed by the public, other than healthcare facilities. This work should consider: - The relative priority and costs and benefits for improving ventilation in different building types (or parts of buildings) – for example, schools, prisons, aged care facilities. - The costs and benefits of improving ventilation across existing buildings, compared to new buildings. - The incremental costs and benefits of improving ventilation over and above alternative interventions that may be cheaper and easier (such as masking). - The use of standards, guidance and voluntary codes. - The benefits that accrue outside pandemics (such as reduced respiratory disease transmission, and improved workforce productivity and student performance) because of improved air quality. - Reviewing and improving building standards and codes, given the above considerations.	Ministry of Business, Innovation & Employment				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	25	Determine appropriate governance arrangements and responsibilities for a coordinated economic response to a pandemic, in both short- and long-term scenarios, by: a. Clarifying relevant principles and the respective roles and responsibilities of economic agencies to ensure the coordinated delivery of an economic and fiscal response. b. Ensuring a forward-looking view during a pandemic on likely evolving scenarios and exit strategies. c. Developing a shared Treasury and Reserve Bank of New Zealand playbook aimed at obtaining a common understanding on how the appropriate level, sequencing and composition of monetary and fiscal support might play out in a pandemic, and the arrangements needed to ensure appropriate monetary and fiscal policy collaboration in an emergency. d. Ensuring that principles of sustained good fiscal, and sound monetary and financial system management are not compromised when implementing recommendation 25c. e. Ensuring the ongoing supply of essential financial services. f. Providing, and publishing, advice on prudently rebuilding fiscal buffers to ensure that there is fiscal headroom for responding to future emergencies. g. Establishing mechanisms that can fast-track effectiveness, 'reach', and value-for-money assessments to ensure high quality and targeted public expenditure.	- All economic sector agencies on recommendations 25a and 25b and 25g - The Treasury and Reserve Bank on recommendations 25c and 25d - Reserve Bank, Financial Markets Authority and the Treasury on recommendation 25e - The Treasury on recommendation 25f and oversight of 25g				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	26	Develop a labour market plan for responding to a pandemic that: - Identifies possible labour market gaps and vulnerabilities that might arise during a pandemic, and which skill and labour shortages are likely to need prioritising to maintain necessary goods and services. - Explores how these gaps and vulnerabilities might be addressed, including through training settings; identifies the key skills that might need to be sourced from overseas; and proposes how these skills can be obtained. - Identifies how quarantine and isolation management and allocation systems can assist in meeting urgent labour market needs.	- Ministry of Business, Innovation & Employment - Ministry of Health on recommendation 26c				
	27	To ensure ongoing operation of supply chains: - Continue to work with international partners to develop ways of minimising future supply chain disruptions during a pandemic, including through the Indo-Pacific Economic Framework work on supply chains. - Build on existing work programmes to improve the government's knowledge of domestic and international supply chains (including through improved government data collection and use of international and domestic supply chain information) and the inputs Aotearoa New Zealand manufacturers and producers rely on and how these could be affected in a pandemic. - Improve and maintain relationships and information-sharing between government agencies, shippers and supply chain operatives, with the aim of increasing resilience and enabling better preparation against supply chain threats. - Establish a programme to improve private sector knowledge of supply chain trends and practices, and how to mitigate performance problems to improve commercial resilience to a pandemic.	Ministry of Business, Innovation & Employment with Ministry of Transport and other relevant agencies				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	28	Assess what steps are needed prior to and during a pandemic to maintain port performance, and assess trends in international trade, aviation and shipping leading to a plan to mitigate the risk of transport shortages or bottlenecks.	Ministry of Transport				
	29	Ensure the ongoing functioning of lifeline utilities, and continued provision of necessary goods and services during a pandemic, by: a. Working with providers to assess and understand the risks that both short-lived and protracted pandemics pose for the lifeline utilities they are responsible for. b. Considering what measures the government should take to ensure the continued provision of necessary goods and services.	Ministry of Business, Innovation & Employment				
	30	Develop a comprehensive plan for financial assistance schemes during a pandemic to support people and businesses and maintain employment. It should include: a. Options that are proportionate, suitably targeted, and take account of the needs of different people (with particular regard to those groups that are already most vulnerable). b. Clear agency responsibilities. c. Where pre-existing economic and social supports may be inadequate in a pandemic, and options to address gaps. d. How measures would be monitored, reviewed and assessed for quality and effectiveness of spend, and could be adapted over different phases of a pandemic. e. Indicative exit strategies. f. Compliance systems to ensure the effectiveness of support measures.	The Treasury, Inland Revenue, Ministry of Social Development, Ministry of Business, Innovation & Employment and other agencies if required				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	31	Determine appropriate governance arrangements and allocation of responsibilities for a coordinated welfare response in both short- and long-term pandemic scenarios, including: a. Identifying agencies that need to be involved and the leadership and governance mechanisms to enable a collective response that is ready to be activated urgently at the start of a pandemic. b. Strengthening regional structures to ensure improved coordination among agencies and between agencies and local delivery organisations. c. Building internal capability to partner effectively with community agencies and iwi.	Ministry of Social Development with other relevant agencies				
	32	In any future pandemic, ensure policy response options and funding mechanisms are in place to: a. Address the housing, income, food security and safety needs of people and households to enable them to manage through a pandemic. b. Target the needs of people who are hardest hit during emergencies. c. Address additional mental health issues that arise during and after a pandemic.	Ministry of Social Development, Ministry of Housing and Urban Development and the Ministry of Health with other relevant agencies after engagement with emergency services and other providers				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	33	Plan and coordinate cross-sector approaches to commissioning delivery of community services in a pandemic so that: a. Mechanisms are in place to allocate and distribute funding quickly and efficiently in a future pandemic or emergency to ensure providers have the resources to respond to immediate community needs. b. Any gaps in coverage are identified and addressed (including by developing new capability and relationships in underserved communities). c. Flexibility in delivery approaches is supported, balanced with appropriate accountability arrangements. d. There are clear processes and communications for winding down resources so this is signalled to service providers and community organisations receiving funding.	Ministry of Social Development with relevant social sector agencies				
	34	Develop a sector pandemic plan that balances the need to maintain a functioning prison system with the wellbeing and human rights of the prison population, including: a. Identifying and anticipating the range of options, tools, and settings that could be applied in a pandemic; and ensuring that operational implementation is consistent with human rights and te Tiriti compliance across all sites. b. Having plans to maintain staffing during a pandemic, to mitigate as much as possible restrictions such as reduced outdoor and physical activity time. c. Providing mitigations to lessen the impact of necessary restrictions, support technology and transportation options, ensure transparency and enable the role of oversight bodies.	Department of Corrections Ara Poutama Aotearoa working with other relevant justice sector agencies				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	35	To ensure access to education can be maintained during a pandemic: - Continue to coordinate planning work within the schooling sector (including peak bodies) which will allow schools and places of education to remain open as much as possible in a pandemic – by, for example, pivoting to remote learning, flexibility of the curriculum, teacher capability for teaching in online and hybrid learning environments, and planning for student access to digital devices and connectivity. - Plan support for the early childhood sector which can be urgently activated, so that early childhood education can continue as much as possible in a pandemic of extended duration. - Plan support that can be urgently activated for the international education sector, including consideration of financial implications and pastoral care for international students.	Education agencies				
Group 5: Ensure enablers are in place	36	Review how public sector agencies supported the Crown in its relationship with Māori under te Tiriti in the COVID-19 pandemic. This should include: - Identifying good experiences and practices in the use of existing te Tiriti frameworks and partnerships in the COVID-19 response and considering how these can be supported to continue. - Identifying and changing any structures, behaviours and practices that prevented existing te Tiriti relationships, frameworks and partnerships from being used in the COVID-19 response or might prevent them being used in another pandemic. - Using the results of reviews to establish better relationships, protocols and partnerships with iwi and Māori to work towards outcomes for Māori that are equitable, culturally appropriate and consistent with te Tiriti.	Public sector agencies, in conjunction with Te Puni Kōkiri and Te Arawhiti, and in partnership with appropriate Māori organisations				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	37	Ensure all relevant legislation is fit for purpose in a pandemic, including: - Ensuring the Health Act 1956 and other relevant health legislation provide sufficient powers for an initial response to a pandemic, including updating the definitions to include the provision for a quickly emerging and unidentified pathogen, modernising language, ensuring the appropriateness of powers for the enforcement and making of orders, and ensuring the legal framework for large-scale, centralised contact tracing is appropriate. - Reviewing the Epidemic Preparedness Act 2006, including the threshold for modification orders. - Developing 'model' bespoke pandemic legislation that considers the strengthening of standing legislation (as per recommendations 37a and 37b) and the provisions provided by the COVID-19 Public Health Response Act 2020 framework, as well as feedback from relevant consultation with stakeholders. This should include consideration of what should be in primary and secondary legislation, and whether the model legislation should be left dormant or enacted as soon as possible. - Any legislative changes arising from policy reviews by individual agencies which identify changes in legislation needed to effectively respond to a future pandemic and/or ensure they can continue to provide services. - Reviewing Aotearoa New Zealand's fiscal responsibility policies and legislation (within the Public Finance Act 1989) to identify whether further measures are required to protect our fiscal resilience and ability to respond as the need arises to future pandemics (as well as other potential crises with a significant fiscal impact).	- The central agency function and Ministry of Health with other relevant agencies - The Treasury on recommendation 37e				

Group	Rec. no.	Recommendation	Responsible agency/ies	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments
	38	Provide for the management and review of the infrastructure needed to support each sector's response to, and specific role in a pandemic, such as information communication technology, data systems, payment systems, contracting and operational systems, to ensure they are fit for purpose and ready for deployment.	All agencies				
Group 6: Implement these recommendations	39	Ensure timely implementation of the recommendations of Phase One of this Royal Commission of Inquiry, by: - Assigning a minister to lead the response to, and implementation of, the recommendations arising from Phase One as soon as practicable. - Requiring progress against the Phase One recommendations to be reported to the responsible minister, at least every six months. This should include an overall view of progress against all recommendations by the central agency function, as well as reporting by individual agencies on applicable recommendations. A summary of these reports should be made publicly available. - Tabling a report in Parliament on progress against the Phase One recommendations within 12 months of this report being completed.	Central government				

4.0 OAG's pandemic reports

Table 3: Implementation of the recommendations of OAG's pandemic reports

Rec. no.	Recommendation	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments/ explanation
PPE 2020 1	The Ministry of Health regularly review district health boards' health emergency plans to ensure that they are complete, up to date, and consistent with each other and with the Ministry's overarching Emergency Plan. The plans need to be kept current and tested regularly				
PPE 2020 2	The health emergency planning framework contain specific guidance about responsibilities for procuring and distributing personal protective equipment				
PPE 2020 3	The Ministry of Health and district health boards, with appropriate health and disability sector representatives, review how clinical guidelines for personal protective equipment will be prepared or amended and consistently communicated during emergencies. The Ministry needs to ensure that demand forecasting, supply, and procurement are updated to take account of changes to guidance that have an effect on demand				
PPE 2020 4	The Ministry of Health consider whether the roles, responsibilities, coverage, requirements, and planning assumptions for maintaining the national reserve of personal protective equipment are clear and remain appropriate				
PPE 2020 5	The Ministry of Health work with other government agencies to determine how workers and providers not currently covered by the national reserve of personal protective equipment access it in the future and clarify roles and responsibilities for this change				
PPE 2020 6	The Ministry of Health regularly reassess assumptions for the categories and amount of personal protective equipment to be held in the national reserve				
PPE 2020 7	The Ministry of Health implement a centralised system for regular public reporting on the national reserve and implement periodic stocktakes to confirm the accuracy of the data and the condition of the stock				
PPE 2020 8	The Ministry of Health reintroduce a requirement for district health boards to manage national reserve stock in such a way as to reduce the risk of stock becoming obsolete				
PPE 2020 9	The Ministry of Health, in collaboration with district health boards, prepare more detailed operational plans and processes that describe how the national reserve system should operate (including distribution mechanisms) and test these as part of future national health emergency exercises				

Rec. no.	Recommendation	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments/ explanation
PPE 2020 10	The Ministry of Health and the district health boards strengthen the procurement strategy by including an analysis of risks to the supply chain and have a plan to address those risks				
WSS 2021 1	Ensure that criteria are sufficiently clear and complete to allow applicant information to be adequately verified				
WSS 2021 2	Put in place robust post-payment verification measures, including risk-based audits against source documentation, to mitigate the risks of using a high-trust approach				
WSS 2021 3	Test the reliability of a sample of the post-payment assurance work it carried out against documentary evidence held by applicants				
WSS 2021 4	Prioritise remaining enforcement work, including: - seeking written confirmation from applicants (which could be targeted towards larger or risk-indicated applicants) of compliance with the eligibility criteria and the obligations of receiving the subsidy; and - pursuing prosecutions to recover funds and/or to hold businesses to account for potentially unlawful behaviour				
WSS 2021 5	Carry out timely evaluation of the development, operation, and impact of the Wage Subsidy Scheme and use the findings to inform preparation for future crisis-support schemes				
Vaccine 2021 1	Continue to be transparent in its public communications about supply risks and the potential impact on the roll-out schedule				
Vaccine 2021 2	Complete contingency plans for major risks, for example, vaccine doses do not arrive in New Zealand at the scheduled time or in the expected quantities, adequate workforce is not able to be secured, key systems are not ready on time, or a community outbreak of COVID-19				
Vaccine 2021 3	Continue to improve guidance to district health boards about the scenarios in which it is acceptable to depart from the sequencing framework and make this transparent to the public				
Vaccine 2021 4	Continue to work with district health boards and Māori, Pasifika, and disability health care providers to make sure equity considerations are fully embedded in delivery plans				
Vaccine 2021 5	Provide more clarity to primary health care providers (including general practitioners) about their role in the wider roll-out to ensure that they have adequate time to prepare				

Rec. no.	Recommendation	Have been implemented (fully or partially)	Are still being considered	Decided not to implement	General comments/ explanation
Vaccine 2021 6	Continue to strengthen efforts to raise public awareness of the immunisation programme in a way that: - ensures that communications are co-ordinated with key vaccination events; - encourages uptake of the vaccine; and - is tailored to different audiences, in particular Māori, Pasifika, people with disabilities, and harder-to-reach communities				
AoG 2022 1	Ensure that there is central co-ordination and clear roles and responsibilities for: - government agencies to keep emergency management plans up to date and consistent with agreed standards, current guidance, and other best practice; - implementing improvements from regular emergency management exercises and other evaluations of emergency readiness; and - monitoring progress in implementing those improvements				
AoG 2022 2	Ensure that key staff maintain a good understanding of all-of-government strategic crisis management, hazard risk management, and emergency management frameworks, including relevant legislation and guidance on lessons management				
AoG 2022 3	Develop and maintain workforce plans for sustainably staffing long-term emergency responses (which should include appropriate mechanisms for recruitment, redeployment, training, and supporting staff well-being)				
AoG 2022 4	Demonstrate how they are making improvements during an ongoing response by: - systematically identifying lessons, taking action, and monitoring progress; - seeking independent expertise and acting on that advice, as appropriate; and - reporting the findings of reviews publicly in a timely and accessible way, including whether they have implemented recommendations				
AoG 2022 5	Improve the transparency of, and engagement with the public on, risk, readiness, and response arrangements to inform strategic policy, planning, investment, and resourcing decisions				
AoG 2022 6	Provide regular assurance to Parliament about the public sector's readiness for major disruptive events, including how they have implemented our recommendations				

Endnotes

- 1 Office of the Auditor-General (OAG) (2024). *Responses to our recommendations about the co-ordination of the all-of-government response to the Covid-19 pandemic in 2020*. [online] Available at: <https://oag.parliament.nz/2024/covid-19-follow-up> [Accessed 17 Sep. 2025].
- 2 Office of the Auditor-General (OAG) (2024). *Letter to the Finance and Expenditure Committee*. [online] Available at: <https://oag.parliament.nz/2024/covid-19-follow-up/letter-to-fec.htm> [Accessed 17 Sep. 2025].
- 3 Ministry of Health (MOH) (2024). *New Zealand Pandemic Plan – A framework for action*. [online] p.4. Available at: https://www.health.govt.nz/system/files/2024-07/interim_nz_pandemic_plan_v2.pdf [Accessed 17 Sep. 2025].
- 4 McGuinness Institute (2025). *OIA 2025/11 – Pandemic Plan (Interim update – July 2024), follow-up on recommendations and the National Reserve Supply*. [online] Available at: <https://www.mcguinnessinstitute.org/publications/oias-correspondence> [Accessed 17 Sep. 2025].
- 5 Royal Commission of Inquiry into COVID-19 Lessons Learned (2024). *Whitiki Aotearoa: Lessons from COVID-19 to prepare Aotearoa New Zealand for a future pandemic Consolidated lessons and recommendations*. [online] pp.29–49. Available at: <https://www.covid19lessons.royalcommission.nz/reports-lessons-learned> [Accessed 17 Sep. 2025].
- 6 Office of the Auditor-General (OAG) (2020). *Management of personal protective equipment in response to Covid-19*. [online] p.8. Available at: <https://oag.parliament.nz/2020/ppe> [Accessed 17 Sep. 2025].
- 7 Office of the Auditor-General (OAG) (2021). *Management of the Wage Subsidy Scheme*. [online] p.6. Available at: <https://oag.parliament.nz/2021/wage-subsidy> [Accessed 17 Sep. 2025].
- 8 Office of the Auditor-General (OAG) (2021b). *Preparations for the nationwide roll-out of the Covid-19 vaccine*. [online] p.6. Available at: <https://oag.parliament.nz/2021/vaccines> [Accessed 17 Sep. 2025].
- 9 Office of the Auditor-General (OAG) (2022). *Co-ordination of the all-of-government response to the Covid-19 pandemic in 2020*. [online] p.11. Available at: <https://oag.parliament.nz/2022/covid-19> [Accessed 17 Sep. 2025].
- 10 McGuinness Institute (n.d.). OIAs and other correspondence. [online] Available at: <https://www.mcguinnessinstitute.org/publications/oias-correspondence> [Accessed 17 Sep. 2025].



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