



Work Programme 2026-27

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INTRODUCTION

As Inspector-General of Intelligence and Security (IGIS), I provide independent oversight of New Zealand's intelligence and security agencies, the New Zealand Security Intelligence Service (NZSIS) and the Government Communications Security Bureau (GCSB). My oversight is directed at ensuring the agencies operate lawfully and in a manner New Zealanders would think proper.

The work of my office includes repeating tasks, such as reviews of warrants issued to the agencies, and self-initiated reviews or inquiries that examine specific areas of agency activity. I also investigate complaints against the agencies.

The Intelligence and Security Act 2017 (ISA) requires me to prepare and publish a work programme each year. This, along with my annual report and public reports of inquiries and reviews, is an opportunity to inform the public of what oversight involves. Some details cannot be published, to avoid disclosing sensitive information. I aim to be as transparent as possible, however, to assure the public that oversight of the agencies is active and wide-ranging.

Apart from recording reviews or inquiries already under way, my work programme identifies the topics I will be examining rather than the means of examination. Experience has shown the need for flexibility in determining the most effective way to scrutinise the agencies' activities. Issues or risks that seem apparent at the outset are not necessarily those that remain after research and analysis. Sometimes an area of intelligence activity selected for attention turns out not to require a full review, eg if key questions are answered quickly. Equally a topic that initially prompts only a few questions can turn out to require deeper investigation. Looking ahead, therefore, I set out matters I expect to focus on, whether by review, inquiry, monitoring, or other forms of engagement with the agencies.

In identifying topics for attention I aim to cover areas of compliance risk, follow up on issues arising from past reviews and inquiries, and keep abreast of changes in the nature and scope of agency activities. Over time I aim for balanced scrutiny of both agencies, though the number of topics relating to each is not necessarily equal from year to year.

This year I have been conservative in adding new topics to those I am already engaged with, for two reasons. First, I intend to commit resources in the coming year to projects to assess and promote the ongoing fitness of my office's systems and procedures for effective oversight. Second, my office will host the annual conference of the Five Eyes Intelligence Oversight Review Council (FIORC) in the coming year and organising that will involve all hands. I will begin 2026-27 with a senior legal advisor and two senior investigators at work (3 FTE) along with myself, the Deputy Inspector-General and an office manager/executive assistant (0.8 FTE).



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OVERSIGHT TOPICS

These are the matters I expect to concentrate on in the coming year. I may add, remove or defer items, depending on resourcing needs and any emerging priorities (eg complaints requiring substantial investigation, unforeseen issues for inquiry or review).

Activities in the Pacific (both agencies)

In 2025-26 I began a broad scan of both agencies' activities relating to the South Pacific. The stability and security of the region is a long-standing Government intelligence priority. New Zealand also provides protective security advice to Pacific nations. This work will conclude in the coming year with an assessment of what continuing access, information and analysis is required for oversight.

"Sensitive category individuals" (both agencies)

Also begun in 2025-26, this work is examining how the agencies apply safeguards to intelligence activities relating to persons aged under 18, considering their vulnerabilities. This was prompted by the agencies themselves expressing concern about the increasing number of young people coming to their attention, particularly through exposure online to violent extremist rhetoric and imagery. Young persons are treated as "sensitive category individuals" by the agencies, which entails a higher level of managerial oversight. I am reviewing cases to assess how this plays out in practice. I expect to finalise a classified report in 2026-27.

Use of psychologists (NZSIS)

In 2025-26 I began a review of how the NZSIS uses psychologists. Following engagement with the agency on scope I am focusing initially on how psychologists contribute to decisions on recruitment, vetting and personnel security. This work will continue in the coming year, during which I expect to complete a classified report.

Conflict-related intelligence activity (both agencies)

I will continue to monitor both agencies' intelligence activities related to armed conflict, particularly anything relevant to war in Ukraine and the Middle East. This means tracking intelligence sharing, associated human rights risk assessments, and any support to military operations. Where necessary I seek more information and I am always able to initiate a review or inquiry if I think that is required.

Review of intelligence sharing (GCSB)

This review of how the GCSB reviews and approves requests from partners for information from a specific access was in my 2025-26 work programme. I expect it to be at an early stage at the beginning of the coming year so it will mostly occur in 2026-27. I intend to explore whether it will be effective to review a sample of partner requests to check how they are assessed and what conditions and assurances underpin the provision of information. I will also look at how longer-term monitoring might be achieved.

Disruption (both agencies)

“Disruption” or “threat mitigation” is action by an intelligence agency aimed at removing or reducing a security threat. Although the ISA prohibits the agencies from taking action to enforce measures for national security, they have some scope in law to undertake disruption, eg by issuing warnings. The GCSB also has an exception to the rule when seeking to counter cybersecurity threats. I began a review of relevant operations in 2025-26 and expect to complete it in the coming year.

Vulnerability management and disclosure (GCSB)

This topic sharpens the focus of a previously proposed review, and will examine the Bureau’s approach to balancing the use and disclosure of cyber and digital vulnerabilities.

Deployment of artificial intelligence (both agencies)

Over the past two years I have reviewed the state of regulation and governance of artificial intelligence (AI) from an intelligence perspective, and the New Zealand agencies’ use of AI. I intend to maintain a close watch on this, monitoring the agencies’ applications of AI and seeking any further information we need. Where a review or inquiry seems necessary I will initiate one, but in any case I will seek to report on my findings to the extent possible.

OFFICE CAPABILITY PROJECTS

The office of the IGIS in its current form, with investigative staff and the IT systems necessary for both classified and unclassified material, was set up in 2014-15. Since then our methods and procedures have evolved, though the basics remain the same. As we look ahead not just to the coming year, but to the next ten, it is time to take stock of our systems and capabilities. Among other factors, digital transformation and deployment of AI are proceeding rapidly in intelligence. Oversight will have to keep up. A small office needs to look for improvements in efficiency and productivity wherever they can be found. In 2026-27 we will finalise an assessment of the current status of our operation, identifying priorities for change and setting up projects to implement it. This work will require time and effort from all staff. I am confident however that there are significant gains to be made in the effectiveness of our oversight.

UPCOMING PUBLIC REPORTING

My reviews typically result in classified reports, provided to the Minister responsible for the relevant agency and to the relevant Director-General. As far as possible I seek also to report publicly. This involves crafting public reports carefully, taking account of the views of the affected agency, to ensure that my reporting is as informative as possible without compromising security or New Zealand’s international relationships. In some cases, where relatively little can be disclosed, I will report on a review only in my annual report.

In the coming year I expect to report publicly on some oversight activity that was completed, or nearly so, in the past year, including:

- A review of both agencies’ use of artificial intelligence.

- A review of both agencies' execution of class warrants.

REGULAR REVIEW AND COMMENT

- **Intelligence warrants.** My office reviews all intelligence warrants issued to the Service and the Bureau.
- **Agreements and authorisations.** My office reviews, or is consulted on, a range of legal instruments and agreements that enable intelligence gathering. These include:
 - Direct Access Agreements, enabling agency access to specified government databases;
 - Business Records Approvals and Directions, authorising agency acquisition of information from telecommunications and financial service providers;
 - Assistance and cooperation agreements with foreign partner agencies.
- **Compliance incidents.** Both agencies encourage staff to self-report inadvertent breaches of law or policy controlling intelligence activity. These incidents are examined to identify any systemic issues and I am notified of those confirmed as breaches requiring investigation. My office reviews the agency's response and seeks further information and assurance where necessary.
- **Progress on recommendations.** Where I have made (and the agencies have accepted) recommendations for change to systems, policies and procedures, my office engages with the agencies on implementation.
- **Assessment of agency compliance systems.** Each year in my annual report I am required to certify the extent to which the agencies' compliance systems are sound. This requires compilation and analysis of a broad range of information on the relevant systems and practices.
- **Site visits.** Periodically I and my staff visit both agencies' operational sites to observe and acquire information on their technologies and practices.

COMPLAINT INVESTIGATIONS

Each year I investigate complaints received about acts, omissions, practices, policies or procedures of the intelligence agencies. These investigations vary widely in duration and the resources required. By law they must be investigated in private, though public reporting of a completed inquiry is required to the extent possible.

CONTRIBUTION TO LEGISLATIVE REFORM

In recent years I have been consulted by the independent reviewers of the Intelligence and Security Act 2017 and officials working on the Government response to the reviewers' report. My office continues to provide input, on request, to the policy process led by the Department of the Prime

Minister and Cabinet. This includes advice on matters relating to oversight of the intelligence and security agencies.

ENGAGEMENT WITH OTHERS

Though I am not subject to Ministerial direction, I provide my reports to the Minister responsible for the agencies and make myself available to discuss them. Each year, in accordance with the ISA, I consult the Minister on a draft of my work programme. I also attend the Intelligence and Security Committee of Parliament annually to take questions on my annual report and any other matters the committee wishes to raise.

I engage regularly with other New Zealand integrity agencies, such as the Privacy Commissioner, Auditor-General and Ombudsman, public sector peers, the intelligence sector and public interest groups to explain the work of my office and keep in touch with external perspectives on national security and privacy. In the coming year I will be meeting on a regular basis with the recently established Inspector-General of Defence, who has similar functions and potential overlaps in jurisdiction.

I also engage with intelligence sector oversight bodies internationally, particularly those of the other 'Five Eyes' countries (Australia, Canada, the United Kingdom and the United States). In the coming year I will host the Five Eyes oversight conference and my office will contribute to related networks sharing information on good practice. My staff attend local conferences and seminars on intelligence and security matters each year.

I will continue my engagement with the Commissioners of Intelligence warrants, who have shown increased interest in engaging with my office to take advantage of our knowledge of the agencies' operations.