RECORDS APPRAISAL & DISPOSAL OF GOVERNMENT RECORDS

20 years on from the Public Records Act 2005: A review of progress



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INTRODUCTION

This paper focuses on the current state of appraisal and disposal implementation processes introduced by Archives New Zealand (Archives NZ) under the *Public Records Act 2005* (PRA). Appraisal is one of the most important activities undertaken by any archival institution; most commonly it determines what records from agencies such as groups and organisations are of sufficient archival value to warrant permanent retention and what records are of temporary value and appropriate for destruction. Disposal (or sentencing) is part of this process, often involving the consistent identification of high value records as archives against a disposal authority and destroying low value records after a specified period.

The points covered here may be of interest to a wide range of groups and individuals, particularly those interested in the accountability and transparency of government decision-making, rights and entitlements, and specialist and historical research. This is because appraisal and disposal are prerequisite processes in the identification and preservation of archives generally.

The appraisal of records has been a core function of New Zealand's national archives since the establishment of the then National Archives following the *1957 Archives Act*. However, during this early period appraisal decisions were often poorly documented and did not appear to follow any consistent methodology. This lack of appraisal documentation has frustrated some modern researchers and Archives NZ itself when looking for explanations as to why some records were retained as archives and others destroyed.

By the mid 1980's the appraisal process became more systematic with the introduction of structured appraisal reports. This change at least partly reflected increased process maturity at National Archives - something necessitated by the "Rogernomics"[1] revolution in government from 1985. The political state also led to unprecedented quantities of records suddenly becoming available for appraisal owing to restructuring across government, the dis-establishment

of many previously core agencies such as the *Ministry of Works*, and the creation of State-Owned Enterprises which inherited many government functions.

Since this period, an even greater challenge for appraisal has been an ongoing technological revolution, with ever increasing quantities of digital records being created which require a completely different approach to appraisal. Most significantly, a change from a largely reactive 'end of life' lifecycle approach commonly applied to physical records to a proactive interventionist 'continuum' approach which necessitates intervention at the point of digital records creation (or before).[2]

In my article on records appraisal published in the October 2009 - April 2010 edition of Archifacts (*How do we get it right? Some thoughts on Appraisal in New Zealand and what it means for us as archivists, records managers, researchers and other stakeholders*),[3] I outlined three potential future scenarios for appraisal within the New Zealand government context. The first scenario was that Archives NZ re-engineers appraisal processes in recognition of the changing technological and recordkeeping environment. The second was that Archives NZ does not adapt its appraisal approach to the new environment. The third was that Archives NZ 'muddles through', making some changes to appraisal processes but avoiding a full commitment to change.

This paper considers the progress Archives NZ has made in adapting its appraisal and disposal implementation approach since 2010 and reflects on which of the above scenarios best fits Archives NZ's current approach. The focus then shifts to exploring the issues and factors impacting on improving the level of appraisal coverage by Archives NZ. To do this, the paper focuses on information from two key Archives New Zealand publications; the *State of Recordkeeping Reports*[4] (hereafter Recordkeeping Reports) and the *Public Sector Information Management Survey Findings*[5] (hereafter Survey Findings). These Recordkeeping Reports and Survey Findings were conducted between 2018 and 2024 to assess how Archives NZ had progressed against their own measures of success; namely, against levels of disposal coverage and implementation. The article also refers to periodic discussions regarding appraisal methodology and strategy in several of these reports.

Firstly however, it needs to be noted that Archives NZ's published reports referencing appraisal during this period lack coherent, consistent strategy and methodology for identifying and prioritising the highest value records in government. Rather,

Archives New Zealand's reporting around appraisal has largely focused on measuring appraisal progress by the level of disposal coverage across government rather than the value of records appraised. Despite the limitation of this measure, it is still a useful indicator of Archives New Zealand's success in achieving its nominated objectives around disposal coverage over time.

A NEW ACT FOR A CHANGING RECORDKEEPING WORLD

By the late 1980's the *1957 Archives Act* was not fit for purpose, particularly in the face of contemporary recordkeeping issues. Most pressingly, the introduction of electronic systems for creating and storing records was steadily eroding the relevance of the traditional concept of the appraisal archivist as a 'sifter' of paper records, often decades after they had been closed. A Public Records Bill was introduced into Parliament as early as 1984 but a later version only passed as the *Public Records Act* (PRA) in 2005. The new PRA finally introduced a modern framework for managing government records irrespective of format, providing Archives NZ with the means to engage in the management of records and information from creation to disposal via a range of instruments. These included mandatory recordkeeping audits and the ability to issue standards.

For appraisal, the most significant change was the introduction of a public notification process (PRA s20). This meant that appraisal recommendations (usually in the form of appraisal reports and disposal schedules) were required to undergo a public comment or notification process before final approval by the Chief Archivist. In essence this meant that the public would be provided a right to comment on draft appraisal recommendations prior to the final approval of disposal authorities by the Chief Archivist. The primary means for facilitating this was by making appraisal documentation available for public comment via the Archives New Zealand website for a minimum of 30 days. This provision was a late addition to the Public Records Bill, added in response to public submissions.

At the time there were divergent views within National Archives about the likely effectiveness of the public comment or notification process, particularly for facilitating external engagement around appraisal approvals. Based on my personal experience working with these processes, the public notification process has subsequently proven to be an ineffective, clumsy and time-consuming tool for facilitating public engagement in appraisal decision-making – one that has unnecessarily complicated the appraisal process and provided little benefit to the quality of the final disposal authorities.

ARCHIVES NEW ZEALAND'S APPROACH TO APPRAISAL, DISPOSAL COVERAGE AND IMPLEMENTATION

In May 2017 Archives New Zealand outlined its ambitious appraisal plan around increasing disposal coverage in its *Archives 2057 Strategy*.[6] The Strategy boldly described the level of information management maturity as "unacceptable" among agencies 10 years after the PRA[7] and proposed that within 4 years (i.e. by 2021) a "great" state would exist where all core public sector records would be covered by disposal authorities, thus increasing coverage from 80% coverage to 100%.[8] The Strategy did not indicate how such a result might be obtained, and as demonstrated below, the disposal coverage measures have never come close to being achieved.

In my opinion, Archives New Zealand's primary focus should be to ensure that the most significant records of government are identified, appraised and preserved as archives. A secondary purpose of appraisal is authorising and enabling the destruction of low value records. Regardless of whether all government agencies have disposal authorities or not, it is my view the current Archives New Zealand approach overly focuses on the level of disposal coverage for low value records at the expense of ensuring the identification and preservation of high value ones. This opinion is predicated on two related assumptions. Firstly, that some functions and activities of government are more important than others. For example, records of Treaty of Waitangi negotiations would be considered more important than administrative records such as staff recruitment files. Secondly, that it is not feasible to ensure total disposal coverage and consistent implementation across all of government.

While defining quality in an appraisal sense can be difficult, the risk of over-focusing on the level of quantity means that even if the level of disposal coverage increases over time, this will not always ensure that the most significant records in government are covered. As a result, it would be extremely difficult for Archives New Zealand to not only ensure that 100% of government agencies have up to date disposal schedules, but that these schedules are consistently implemented in ways that capture all appropriately designated high value records.

Getting agreement about which records should be prioritised from an all-of-government perspective is challenging, despite the adoption of practice-based initiatives such as function-based appraisal. However, any workable government-wide appraisal solutions are made almost impossible for Archives NZ due to the ongoing absence of an appraisal methodology that is supported

by a coherent implementation strategy in a recordkeeping context. This seemingly untenable state is exacerbated by two further factors. The first is that far more information is being created than can be effectively managed, making it inevitable that many nationally significant records will not be preserved as archives. The second is that responsibility for ensuring disposal coverage and implementation is currently left by Archives NZ with individual agencies. These agencies may not always prioritise appraisal work, irrespective of the potential archival value of their records or any risks to their preservation and future accessibility.

This last point may be due in part to agencies finding Archives NZ's processes for transfer and disposal difficult to facilitate. The 2022 / 2023 Recordkeeping Report[9] notes that public sector agencies have struggled to implement records disposal processes, including transfer to Archives NZ. For example, approximately 35% of agencies were reported to be at the "beginning stage" for developing disposal authorities and approximately 50% at the "beginning stage" of implementing them.[10] This is a poor result given that of the five levels of information management maturity identified by Archives New Zealand (beginning, progressing, managing, maturing and optimising),[11] "beginning" is the lowest. It is therefore not surprising that out of the three non-compliance themes highlighted in the report (creation and capture, access to information, and disposal of records) one was records disposal.[12]

Earlier Recordkeeping Reports also demonstrate a similar theme around higher levels of non-compliance for records disposal. For example, the 2021-22 Report noted that more than half were at "beginning" maturity for having a current agency-specific disposal authority, with just a quarter achieving a maturity rating of "managing" (i.e. achieving basic compliance).[13] Between 2018/19 and 2021/22 recordkeeping surveys show that the percentage of agencies having disposal authorities covering all or nearly all records actually fell, from 55-60% compliance in 2018/19[14] to 40-45% in 2021/22.[15] The Chief Archivist's forward to the 2021 Recordkeeping Report acknowledged this trend, stating "a consistently low area of maturity is the implementation of disposal and archival transfer".[16] There also seemed to have been little improvement and even some regression with disposal implementation since the 2018/19 Recordkeeping Survey.

Based on my own experience with Archives NZ's audit processes over the years, I suspect the actual level of disposal coverage is likely to be lower than reported in the Recordkeeping Reports. This is because some agencies reported a

high level of disposal coverage without considering their bespoke or specialised business information and data systems. These systems are often more complex to appraise, resulting in the implementation of disposal actions that are better suited to traditionally structured 'document centric' management systems such as electronic and document management systems. This seems to be confirmed in part by the Survey Findings for 2021-22, which shows that the percentage of agencies implementing some form of records destruction had fallen from 65-70% in 2018-19[17] to 55-60% in 2021-22.[18]

The Recordkeeping Reports and Survey Findings from 2018 to 2024 also show a pattern of stagnant or declining levels of disposal coverage and implementation. A review of these reports shows that Archives NZ's explanations for this have included challenges with implementing digital disposal owing to six reasons. Namely; a lack of functional capability in many digital systems; appraisal being onerous for both the agencies and Archives NZ; a lack of resources and priority given to implementing disposal in agencies; challenges with large scale digital transfers to Archives New Zealand; the suspension of physical records transfers in Wellington; and the moratorium on the destruction of records of potential relevance to the *Royal Commission of Inquiry into Historical Abuse in State Care and Faith Based Institutions*.[19]

While many of the reasons above can be owing to the particular complexities of digital records, the situation for physical records is unfortunately no better. Under the PRA agencies with large holdings of historical physical records are often motivated to develop and implement disposal authorities so they can transfer records to Archives NZ and reduce the cost of managing non-current records they are not funded to maintain or preserve. However, the longstanding suspension of physical record transfers to the main Wellington office has resulted in several perverse effects. One is that historical records are now at increased risk of damage or destruction as agencies, struggling with storage space, place records in substandard storage or management. The other is that a large backlog of stored physical archives is growing in many agencies in the Wellington region, and these will all require transfer to Archives NZ when the transfer restriction is eventually lifted. When this happens no-one yet knows, but I suspect that almost inevitably this will be at a time of reduced resources, making it much harder for Archives NZ to effectively deal with the electronic and physical backlog. For example, in the 1990's, there was a specialist team of three or four appraisal

archivists led by a manager who specialised in appraisal type work and advice. However, ongoing restructuring of Archives NZ functions (including the development of a shared 'heritage campus'[20] with the National Library) may not only reduce regulatory and recordkeeping capacity around transfer and disposal but also inhibit any effective and strategic solutions to the issue.

RECENT ARCHIVES NZ DISPOSAL COVERAGE AND IMPLEMENTATION INITIATIVES

Archives New Zealand has launched several initiatives addressing low levels of disposal coverage and implementation over the last ten years, perhaps in response to this issue being outlined in successive Recordkeeping Reports and Survey Findings. The first was the development of Functional Disposal Authorities (FDA's), as referenced in the 2017/18 Recordkeeping Report.[21] In this report the FDA initiative was described as a component of Archives New Zealand's work to transform disposal machinery across government, and FDA's described as covering specific functions and activities common to multiple government agencies. As a result, these FDA's were expected to provide more consistent and broader disposal coverage across agencies and, consequently, ensure better identification of high value records.

The first stage of the FDA initiative involved Archives New Zealand staff working with the (then) District Health Boards around 2017-18 to develop a disposal authority to test elements of how this new approach might work. In the 2018-/19 Recordkeeping Report it was reported that several disposal authorities were completed, and staff were going to engage with other agencies about the FDA initiative and alternative processes.[22] However, the lack of reference to FDA work in subsequent Recordkeeping Reports suggests that this work has not progressed – something that seems confirmed by the lack of any new sector-specific FDA's in recent years.

In the 2020/21 Recordkeeping Report an Appraisal, Disposal and Implementation (ADI) redesign project was referenced.[23] This project was initiated in recognition that appraisal and disposal systems need to be re-designed for the digital age, and this was to be an all-of-government multi-year programme consisting of three discovery, design and delivery phases. The project also planned to make a change in appraisal approaches from what was described as a "top-down" approach (probably forms of 'macro-appraisal' that had considered record values across government) to a greater focus on individuals and communities. Work commenced in assessing the

technology and tools information management staff in public agencies would need to manage records efficiently. This included automated rules and algorithms to apply disposal policies. However, in the subsequent Recordkeeping Report (2021/22) ADI is noted as being paused to address 'regulatory uplift components'.[24] The lack of reference to ADI in more recent Recordkeeping Reports (including 2023/24) suggests that this work has not progressed since.

Requirements around appraisal still however continue to be acknowledged by Archives NZ. For example, in the Chief Archivist's apology to the survivors of abuse in care dated 20 November 2024,[25] the Chief Archivist apologised for Archives NZ's previous failures to effectively monitor government recordkeeping by not exercising better control over the disposal of care records. The Chief Archivist proposed to amend the *Public Records Act 2005* to strengthen powers around the monitoring of government recordkeeping and the taking of action when issues were identified. A care records disposal authority project was also proposed – one which was to include records relating to aged residential and in-home care.

While Archives NZ's reactive response is understandable in the aftermath of the Royal Commission of Inquiry Abuse in Care reports,[26] I do not think the Chief Archivist's suggestions will do much to address Archives NZ's current need to develop a strategic approach towards their appraisal practice that will prioritise high value records, particularly during a time of reduced resources. In my view the current PRA has sufficient provisions for monitoring public office recordkeeping, Archives New Zealand has tended to be reluctant or inconsistent in using them.

FACTORS INFLUENCING DISPOSAL COVERAGE AND IMPLEMENTATION

Several factors outside of Archives NZ's control should however be acknowledged when it comes to the lack of progress in mitigating issues with appraisal practice. Firstly, the exponential increase in information and data managed by government agencies. This has overwhelmed and invalidated the more traditional methodologies for appraisal and disposal implementation (of which some are still used by Archives NZ) and also left what the Chief Archivist described in the Executive Summary of the 2020-21 as a 'digital landfill'.[27] Secondly, the replacement of electronic content management systems (which often had integrated records management functionality) with systems primarily designed for collaboration and information sharing. For example, *SharePoint*. Without major configuration and/or add-ons, such systems are non-compliant with most

key mandatory recordkeeping requirements around creation, access, use, and re-use, especially disposal implementation. However, government agencies often overlook this, seeing instead significant cost benefits when it comes to implementation and out-of-the box collaboration potential.

In times of significant resource constraints across the government sector, there is an understandable unwillingness by senior management to invest substantial resources in addressing the 'hidden costs' of recordkeeping compliance. The net result is that information management professionals tend to struggle to get the attention of decision-makers when business requirements for new or upgraded systems are being developed, or they can be left out of the loop completely. When this happens, the lack of existing disposal functionality in new systems means that even if agencies create and apply disposal schedules approved by Archives NZ, many will have no means of effectively implementing the range of disposal practices required for compliant recordkeeping.

Some archival institutions have provided guidance about how to improve the compliance of specific collaboration systems including Archives NZ's own *Microsoft 365* advice.[28] Even with such guidance, a lack of specialist skills to configure these systems and a lack of resources to prioritise the work required to improve compliance means that many government agencies with these systems are unable to ensure the preservation and accessibility of information over time.

CONCLUSION

In my 2009 Archifacts article considering future appraisal scenarios, I stated the following:

> The second scenario is that Archives New Zealand does not adequately adapt its appraisal approach to this changing environment and consequently becomes increasingly disassociated from the modern recordkeeping sector and community stakeholders. This will see a decreasing proportion of high value records being appraised and preserved.[29]

Evidence from Archives NZ's Recordkeeping Reports and Survey Findings from 2017 onwards demonstrates that the second scenario is being realised, with consistently low levels of disposal coverage and implementation in government agencies. While initiatives such as the ADI and FDA projects indicate Archives NZ's awareness of a need for change, there appears to be a lack of the will required to sustain effort through to new appraisal outcomes – something possibly exacerbated by the influential role of the Department of Internal Affairs on day-to-day business.

Additionally, there remains a concerning and continuing lack of any form of methodology and coherent strategy to facilitate the proactive identification and

prioritisation of the highest value records in government. In my 2009 article, I noted that without a strategy "a substantial proportion of significant electronic records will be lost without even being assessed by an appraiser".[30] This state is continuing, and with it, the possibility of it leaving permanent holes in the fabric of New Zealand's archival holdings.

This view has been further reinforced by recent correspondence I have had with Archives NZ about their current appraisal review practices. I was advised that since late 2023, Archives NZ had changed its approach to reviewing draft appraisal reports by implementing a prioritised queue according to need, risk and agency dependency. This change was described as temporary and resulting from a number of factors, including the redirection of senior staff time and energy to meet the expectations of *Royal Commission of Inquiry into Abuse in Care*[31] recommendations.

Despite engaging with Archives NZ regarding appraisal since 2023, this was the first I had heard of this approach. I subsequently checked the Archives NZ website for appraisal advice but found no reference to this changed practice. This seems odd since the consequences of this approach may result in less time for staff to review appraisal reports and a progressively adverse impact on overall disposal coverage across government. Information about this changed approach should have been communicated to government agencies and information management professionals to allow them to prioritise their work programmes.

Moving forward, Archives NZ requires a coherent, proactive and consistent approach towards appraisal, both to increase disposal coverage and to prioritise the identification of high value records from the point of creation. This necessitates a significant change from its current passive approach of leaving the responsibility for disposal coverage to government agencies which may not prioritise such work. One possible solution to a more active approach is greater collaboration between Archives NZ and government agencies. This would create intentional partnerships that would improve the quality and level of disposal coverage. It would also prioritise the development of suitable methodology and strategy to ensure that collaborative partnerships are ethical, consistent and effective.

However, in concluding this paper, I find I am less optimistic about the future of appraisal practice at Archives NZ now than when I wrote my original article in 2009. In fact, I am less optimistic than at any other time since I entered the archives profession in 1988. Analysing the evidence from Archives New Zealand's own reports has been a sobering experience – one that demonstrates

that appropriate appraisal and disposal practice in government agencies has deteriorated more than I had originally anticipated.

It seems that Archives New Zealand remains wedded to a failing status quo – one caused by either an unwillingness to change or an inability to make meaningful changes to their appraisal approach. Either way, this is of great concern for a government recordkeeping context that continues to grapple with growing system-based complexity, exponential increases in data, and a range of issues around equitable, ethical, and accountable information management.

A possible net result of this state could be that government agencies will end up having an increasing influence over what records will be available for future researchers, historians and others. They will, by necessity, have needed to step into the gap left by Archives NZ and invested in the resources required to ensure the ongoing accessibility of records they consider to be of high value. If this happens, I suspect that Archives New Zealand, overwhelmed by the change it has not adapted to, will (as I predicted in 2010) continue along a path of increasing irrelevance.

There are times when maintaining a failing status quo is far riskier than making some fundamental changes and risking mistakes or criticism for doing so. The area of appraisal and disposal is one of them. Ultimately, Archives New Zealand has a choice- adapt and reprioritise to meet the changing environment, or carry on as usual and ignore the fact that the world is changing,

ENDNOTES

1. See for example, Manatū Taonga - Ministry for Culture and Heritage, "State-Owned Enterprises Are Born.", New Zealand History Nga Korero a Ipurangi o Aotearoa. n.d., available at https://nzhistory.govt.nz/state-owned-enterprises-act-takes-effect, accessed 9 July 2025.
2. See for example, "Life Cycle vs. Continuum: A Comparison of Theories by Schellenberg and Upward", *Kristyn Leonard*, December 10, 2024, available at https://kristynleonard.com/2024/12/10/growth-unlocked/, accessed 24 July 2025; V. Frings-Hessami, "Continuum, Continuity, Continuum Actions: Reflection on the Meaning of a Continuum Perspective and on Its Compatibility with a Life Cycle Framework," 2022, *Archival Science* 22 (1): 113–28, https://doi.org/10.1007/s10502-021-09371-2.
3. E. Bolger, "How do we get it right? Some thoughts on Appraisal in New Zealand and what it means for us as archivists, records managers, researchers and other stakeholders", Archifacts, October 2009 – April 2010, pp. 9-25.
4. Archives New Zealand, 'Te Pūrongo Mō Te Pēheatanga o Te Pupuri Mauhanga Kāwanatanga Report on the State of Government Recordkeeping', Te Rua Mahara o Te Kawanatanga Archives New Zealand, n.d, available at https://www.archives.govt.nz/about-us/publications/report-on-the-state-of-government-recordkeeping, accessed 8 July 2025.
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6. Archives New Zealand, 'Te Rautaki Rua Mahara 2057 Archives 2057 Strategy', Te Rua Mahara o Te Kawanatanga Archives New Zealand, n.d., available at https://www.archives.govt.nz/about-us/publications/archives-2057-strategy, accessed 8 July 2025.
7. ibid. Page 9.
8. ibid. Page 12.
9. The 2023/24 r*eport on the State of Government Recordkeeping* was published during the time this paper was being written. When it came to Archives New Zealand's appraisal practices, it demonstrated similar findings to the 2022/23 report, indicating little change.
10. See Appendix 3, page 47 of Archives New Zealand, "Report on the State of Government Recordkeeping 2022/23", Te Rua Mahara o Te Kawanatanga Archives New Zealand, n.d., available at https://www.archives.govt.nz/about-us/publications/report-on-the-state-of-government-recordkeeping/report-on-the-state-of-government-recordkeeping-2022-23, accessed 10 July 2025.

11. For example, see "Report on the State of Government Recordkeeping 2022/23".
12. ibid. p. 38.
13. See under "Disposal" in Archives New Zealand, "Report on the State of Government Recordkeeping 2021/22", Te Rua Mahara o Te Kawanatanga Archives New Zealand, n.d., available at https://www.archives.govt.nz/about-us/publications/report-on-the-state-of-government-recordkeeping/report-recordkeeping-2021-22, accessed 10 July 2025.
14. See pp. 28-29 of Archives New Zealand, "Report on the State of Government Recordkeeping 2018/19", Te Rua Mahara o Te Kawanatanga Archives New Zealand, n.d., available at https://www.archives.govt.nz/about-us/publications/report-on-the-state-of-government-recordkeeping/report-on-the-state-of-government-recordkeeping-2018-19, accessed 10 July 2025.
15. See under Disposal: Archives New Zealand, "Report on the State of Government Recordkeeping 2021/22".
16. ibid., p. 4.
17. See pp. 28-29 of Archives New Zealand, "Report on the State of Government Recordkeeping 2018/19".
18. See under *Disposal*: Archives New Zealand, "Report on the State of Government Recordkeeping 2021/22".
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22. See p. 7 of Archives New Zealand, "Report on the State of Government Recordkeeping 2018/19", Te Rua Mahara o Te Kawanatanga Archives New Zealand, n.d., available at https://www.archives.govt.nz/about-us/publications/report-on-the-state-of-government-recordkeeping/report-on-the-state-of-government-recordkeeping-2018-19, accessed 10 July 2025.

23. Archives New Zealand, "Report on the State of Government Recordkeeping 2021/22", Te Rua Mahara o Te Kawanatanga Archives New Zealand, n.d., available at https://www.archives.govt.nz/about-us/publications/report-on-the-state-of-government-recordkeeping/report-recordkeeping-2021-22, accessed 10 July 2025.
24. ibid. See under "Regulatory capability and system uplift sought".
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26. See: Abuse in Care- Royal Commission of Inquiry, "Reports", March 17, 2025, available at https://www.abuseincare.org.nz/reports, accessed 28 July 2025.
27. Archives New Zealand, "Report on the State of Government Recordkeeping 2021/22".
28. Archives New Zealand, "Microsoft 365." Te Rua Mahara o Te Kawanatanga Archives New Zealand. September 2023, available at https://www.archives.govt.nz/manage-information/how-to-manage-your-information/digital/microsoft-365, accessed on 10 July 2025.
29. E. Bolger, "How do we get it right?" p.25.
30. ibid. p.10.
31. Abuse in Care- Royal Commission of Inquiry, "Recommendations", March 17, 2025, available at https://www.abuseincare.org.nz/reports/whanaketia/preliminaries/recommendations, accessed 28 July 2025.