

Community Engagement Strategy for New Zealand's Independent Police Conduct Authority – Amplifying the Public Profile of the IPCA and a Comparison to Other Oversight Models

Prepared by

Julie E. Buchwald

May 2025

With funding from the sponsors of the Ian Axford (New Zealand) Fellowships in Public Policy

Established by the New Zealand government in 1995 to facilitate public policy dialogue between New Zealand and the United States of America Level 5, 26 The Terrace PO Box 3465 Wellington 6011 New Zealand Telephone +64 4 494 1506 E-mail info@fulbright.org.nz axfordfellowships.org.nz

© Julie Buchwald

Published by Fulbright New Zealand, June 2025

The opinions and views expressed in this paper are the personal views of the author and do not represent in whole or part the opinions of Fulbright New Zealand or any New Zealand government agency.

ISBN: 978-0-9951445-5-2

Ian Axford (New Zealand) Fellowships in Public Policy

Established by the New Zealand Government in 1995 to reinforce links between New Zealand and the US, Ian Axford (New Zealand) Fellowships in Public Policy provide the opportunity for outstanding mid-career professionals from the United States of America to gain firsthand knowledge of public policy in New Zealand, including economic, social and political reforms and management of the government sector.

The Ian Axford (New Zealand) Fellowships in Public Policy were named in honour of Sir Ian Axford, an eminent New Zealand astrophysicist and space scientist who served as patron of the fellowship programme until his death in March 2010.

Educated in New Zealand and England, Sir Ian held Professorships at Cornell University and the University of California, and was Vice-Chancellor of Victoria University of Wellington for three years. For many years, Sir Ian was director of the Max Planck Institute for Aeronomy in Germany, where he was involved in the planning of several space missions, including those of the Voyager planetary explorers, the Giotto space probe and the Ulysses galaxy explorer.

Sir Ian was recognised as one of the great thinkers and communicators in the world of space science, and was a highly respected and influential administrator. A recipient of numerous science awards, he was knighted and named New Zealander of the Year in 1995.

Ian Axford (New Zealand) Fellowships in Public Policy have three goals:

- To reinforce United States/New Zealand links by enabling fellows of high intellectual ability and leadership potential to gain experience and build contacts internationally.
- To increase fellows' ability to bring about changes and improvements in their fields of expertise by the cross-fertilisation of ideas and experience.
- To build a network of policy experts on both sides of the Pacific that will facilitate international policy exchange and collaboration beyond the fellowship experience.

Fellows are based at a host institution and carefully partnered with a leading specialist who will act as a mentor. In addition, fellows spend a substantial part of their time in contact with relevant organisations outside their host institutions, to gain practical experience in their fields.

The fellowships are awarded to professionals active in the business, public or non-profit sectors. A binational selection committee looks for fellows who show potential as leaders and opinion formers in their chosen fields. Fellows are selected also for their ability to put the experience and professional expertise gained from their fellowship into effective use.

We acknowledge and thank the following sponsors that support the Ian Axford (New Zealand) Fellowships in Public Policy programme:

- Department of Internal Affairs
- Ministry of Defence
- Ministry of Education
- Ministry of Foreign Affairs and Trade
- Ministry of Health
- Ministry of Justice
- Ministry of Social Development
- Public Services Commission
- Victoria University of Wellington School of Government

Acknowledgements

It has been incredible to live in this charming little Wellingtonian corner of the world – where the moon shimmers on the water and the church sits on the hill – over the past few months. My Axford experience has left an indelible mark on me, and I will remember this vibrant chapter in Aotearoa, both personally and professionally, for the rest of my life. I extend whole-hearted thanks and gratitude as follows –

To the entire Ian Axford Fellowship Board – especially to Roy Ferguson for his hospitality, kindness, and for taking a chance on me. Also to Simon Murdoch for taking an unusual interest in my application from across the world several years ago.

To the Fulbright New Zealand staff and team for orienting us into this experience and for their kindness – especially Penelope Borland, who carries the overall Fulbright vision with grace. Also Lauren Summersell for her willingness to field my many email inquiries, as well as her occasional check-ins to keep us organized. Lauren, you have been the steady hand to guide the ship through a Southerly storm.

To the IPCA Board members – Judge Kenneth Johnston, Elizabeth Sinclair, and Andrew Coleman, each for your varied and noteworthy contributions to my project.

To the IPCA staff – My endless appreciation goes out to Peter Clinton, Warren Young, and the rest of the Corporate Team in particular – Judge, Stu, Kerry, Karen, Mihi, Jaye – and everyone for warmly welcoming me, being curious about LAPD, inviting an American to occasionally join for coffee, and for the endless supply of cookies, crackers, and distracting puzzles. A special thank you to former IPCA General Manager Kevin Currie for his initial thoughts with regard to my proposal and to former head of Investigations, Emma Bunny, for her candid thoughts as well.

I am enormously grateful to everyone at outside agencies generous enough to meet with me in development of this report, and whose time and counsel have been invaluable --

Susan Raice and Eleanore Graham with the Law Enforcement Conduct Commission (Australia)

Oliver Bates with the Serious Fraud Office (New Zealand)

Lily Thielmann with the Civilian Review and Complaints Commission for the Royal Canadian Mounted Police (Canada)

Emma McCleary with the Office of the Privacy Commissioner (New Zealand)

Vanessa Crowe with the Environmental Protection Authority (New Zealand)

Dr. Gary Hickey (United Kingdom)

Lexi Taylor and Tarsha TeRure with the Citizen's Advice Bureau (New Zealand)

Martin Bidois, Lei Mikaele, Lisa Zhang, and Dexter Traill with the Office of the Ombudsman (New Zealand)

Aimee Bryant, and April Hussey with the Law Society (New Zealand)

A massive thank you to my academic advisor, Michael Macaulay of Victoria University of Wellington, for his keen and candid insights specific to developing my research and for his humour along the way. Also to my friend, former colleague, and former Axford fellow, Alexa Daniels-Shpall, for her very helpful review and edits.

I am thankful to everyone at home who allowed me to pursue this Kiwi dream -- Mark P. Smith, former Inspector General in Los Angeles, who provided unyielding support for my application. To former-Acting Inspector General Florence Yu, current Inspector General Matthew Barragan, and the Board of Police Commissioners, who allowed New Zealand to continue to borrow me over the past four months. Also to Manny Lopez for holding down the Community Relations fort in my absence.

I am forever indebted to my little Wellington family and fast-found friends/co-fellows, Kathleen Cochrane and Paul Holland. This experience would not have been the same without the indelible mix of the three of us here together. I so appreciate you sharing your intellect, travel tips, and families with me. The Shepherd Arms Hotel will never be the same, and long live "Ruby's Rainbows That Are Cool!" (Special recognition to my colleague Angela Yiavasis and to Fulbright scholars Travis Richardson and Sarah Goff for their critical contributions to Tuesday Quiz Nights.)

Above all, thank you to my family and best friends in the world who love me from afar and come to see me wherever I am. Especially to my parents, Jan and Gerry Buchwald, brother Mike, sister-in-law Jamie, little nieces Ellie and Mils, and everyone I consider family, actual and chosen – I would never be the person I am without your endless support, kindness, love, and undying belief in me. Much gratitude to everyone who made the trek to Taranaki Street and for bringing me little tastes of home – Leah; Jan and Ger; Tina and Sienna; Negs, Jamie, and Cyrus; Joanna; and Lex.

A significant loss 12 years ago has propelled me to live every moment to its fullest. Wellington ultimately has been a place of expansion, healing, and embracing that mindset. My first week in New Zealand, I took a walk to the Botanical Gardens, not really knowing what would await me. I found everything I had ever wanted in that garden. And so, thank you R.H. — for being my "Uber driver" and for showing me your city, your heart, and KC's Cafe. I leave part of myself behind with you.

Finally, to my past ancestors, future descendants, and all spirits that guide and protect me.... I know you are omnipresent, and I hope I've made you proud.

Kia Whakatomuri te haere whatamua. "Walk backwards into the future."

-- A Māori proverb

Julie E. Buchwald Wellington, May 2025

**Any errors herein that remain, specific to my project, are solely my own. This report is not a product of the Independent Police Conduct Authority or the Office of the Inspector General.

Executive Summary

In recent years, New Zealand's Independent Police Conduct Authority ("IPCA" or "the Authority"), an independent Crown entity charged with oversight of the New Zealand Police ("Police"), has been in search of some tangible and effective recommendations for expanding the office's reach and influence throughout the community. Although there have been two prior efforts in this regard, both undertaken between 2019 and 2023, the IPCA has not implemented most of the previous recommendations. My aim, as an interim Fellow with the Authority over the past four months, has been to assist the IPCA in championing the good work they are doing, reflect on the importance and value of consistent community interaction, and facilitate understanding that the nature of their oversight work can cultivate goodwill amongst the broader New Zealand populace, as well as foster community trust, with regard to policing.

The first portion of this report will focus on key reasons why community engagement – not just outreach but a deeper level of community engagement where the community is prioritized as a valuable partner – is critical to the successful mission of any civilian oversight entity that hopes to gain respect within the communities it serves:

- 1. Community engagement has the strong likelihood of elevating, not diminishing, the public profile and effectiveness of an office.
- 2. Even if it may not be possible to reveal confidential information due to strict confidentiality laws, public education around complaint process issues is crucial for purposes of transparency, accountability, and trust in a public agency.

Ultimately, it is not possible to know what issues different communities care about most unless those communities are directly approached.

The second portion of this report sets forth a case study analysis, as similarly situated jurisdictions can provide some illuminating exemplars of best practices in community engagement. Several comparative agencies are examined: 1) civilian oversight offices that oversee national or regional police forces; 2) the Office of the Inspector General for the Los Angeles Police Department ("LAPD OIG"), my current employer; and 3) several regulatory agencies in New Zealand, of similar size to the IPCA, and/or that have a vital community engagement function. Looking to these outside jurisdictions provides a point of comparison and ability for the IPCA to potentially adopt similar practices, over time, if they choose to do so.

The report will establish that community engagement should be viewed as a meaningful endeavour and, in fact, can be rather easily implemented.

TABLE OF CONTENTS

Ian Axford (New Zealand) Fellowships in Public Policyi
Acknowledgementsiii
Executive Summaryv
Introduction
I. Why Should Civilian Oversight Agencies Engage with Communities?
A. Elevating the Public Profile of an Office through Communication, Dialogue, and Accepting the Community as a True Partner
B. Public Education around Process, even if Investigations Themselves Remain Confidential, Generates Trust and Accountability
II. Comparative Jurisdictional Study9
A. National/Regional Policing Counterparts – Oversight Models and their Community Engagement Strategies
1. Law Enforcement Conduct Commission in Australia9
2. Civilian Review and Complaints Commission in Canada
B. A Local Civilian Oversight Model – the LAPD OIG14
C. Other New Zealand Offices
1. Office of the Ombudsman17
2. Office of the Privacy Commissioner
3. Environmental Protection Authority
4. Serious Fraud Office
Conclusion
Bibliography25
APPENDIX 1 – Comparative Jurisdiction Summary

Introduction

In attempting to crack the code on implementing a productive community engagement strategy for the Independent Police Conduct Authority,¹ it is important to recognize that implementation of any such strategy will be, for the IPCA, a significant paradigm shift, given that community engagement efforts previously attempted by the office have been extremely limited. Accordingly, any proposed strategy should not only be effective, as far as the Authority's ability to interact and build trust with the communities they serve, but perhaps more importantly, it should also be a strategy they can ease into and be comfortable with over time.

The IPCA has faced recent challenges, including resource constraints and needing to do more with less, in addition to a large workload volume resulting from an increased number of complaints being filed in recent years (including approximately 4700 in the Fiscal Year ending 2023-24). Legitimate fear exists that a more active community engagement function could result in even more complaints being received, which the IPCA believes could then dilute the quality of their investigations and their ability to produce work consistent with the office's high standards and the public's expectations. A secondary concern is that the reputation of the office could even be harmed if the office attempts to conduct community engagement and then fails to deliver to a level the IPCA is satisfied with.

As a result, over the past several years, the office has pulled back from the limited engagement efforts they had implemented, such as updating social media accounts and a patchwork of public facing meetings. The IPCA has also generally shied away from executing the community engagement function, given that staff are already feeling like they do not have the time, nor bandwidth, to devote themselves to it in any kind of significant way. One possibility going forward, for the office, would be to hire a full time, experienced community engagement manager, though the budget for this position would need to be fully justified and formally approved. The other option is, essentially, to start with what they have – as far as currently existing staff, resources, and budget – and eventually scale up, once they have ascertained what additional resources would lead to a more robust community engagement function.

Among other reasons why the IPCA has been reluctant to engage more actively with the community is that the culture of the office, generally, has relied on a more traditional and restrictive view that they are bound by strict confidentiality rules, and if people need to find the office to file a complaint, they likely will. The office, led by a sitting judge, has historically operated with a general mindset that their reports speak for themselves. Also, given staff's already significant workloads, they have been apprehensive about engaging in activities that could lead them to be stretched even further. They also feel that until they have the proper outreach materials ready to

¹ The Independent Police Conduct Authority Act of 1988 established that the IPCA operates independently of the Police in exercising its statutory duties, which include receiving and investigating complaints and investigating incidents involving death or serious bodily injury, where it is in the public interest to do so. Under the Act, the IPCA has the ability to investigate a complaint itself, oversee a Police investigation, agree to a resolution approach with the Police, or decide to take no action on a complaint.

go and staff who are more suitably trained in community engagement, they should wait before launching any real effort to engage with the community.

My ultimate goal is to encourage the IPCA to take small steps forward in the community engagement arena, and to inspire confidence that speaking with the communities they serve is not only achievable but also a function worthy of further implementation. I also hope to demonstrate – through the efforts set forth and results achieved by similar offices – that community engagement can be simple, manageable, and worthwhile.

I. Why Should Civilian Oversight Agencies Engage with Communities?

In further explaining why more significant focus on community engagement would be beneficial to the IPCA, it is important to understand why civilian oversight agencies choose to prioritize public engagement and how they go about carrying out this work. Ultimately, oversight agencies engage with communities in many different ways, but the basic reasons for doing so are well-established:

- Perception of a civilian oversight entity can be impacted through communication, dialogue, and accepting the community as a true partner.
- Communities can be educated about public process, even if investigations themselves remain confidential. Information about process, including procedures and timelines, is critical to enhancing public trust in a public organization.

Ultimately, community buy-in must be established – it's not possible to know what issues the community has a vested interest in unless some baseline level of engagement occurs, which can ultimately lead to enhanced organizational trust.

A. Elevating the Public Profile of an Office through Communication, Dialogue, and Accepting the Community as a True Partner

A leading public participation-oriented, non-governmental organization in the United Kingdom has suggested that a "participatory working" relationship generates significantly more beneficial results from an organization's perspective over "traditional policy development and project management" because "[...] consumers, citizens and communities all have a role to play in creating effective public services, alongside public bodies."²

Existing literature further indicates that ongoing, meaningful engagement with the community is not only important to do, and achieve, but is also a marker of an oversight agency's effectiveness.

The National Association for Civilian Oversight of Law Enforcement in the United States has published "13 Principles of Effective Oversight," which were developed in the immediate aftermath of George Floyd's death in May 2020.³

² People and Participation, Involve, p.20.

³ This incident involved a lethal use of force utilized by a Minneapolis Police Department officer against an unarmed Black man as he was under arrest and lying on the ground, indicating that he could not breathe. The incident was filmed by civilian bystanders and captured the officer directly kneeling on Mr. Floyd's neck for over nine minutes.

Among the 13 principles, several are applicable to community engagement, though one is especially relevant:

"As an institution representing the interests of the local community, conducting outreach to the community and local stakeholders is essential to effective civilian oversight. Outreach enables an oversight agency to build awareness of its existence, share reports and findings with the public, build relationships with stakeholders, recruit volunteers, solicit community input and involvement, facilitate learning and greater understanding, broker improved relationships, build coalitions, and develop a greater capacity for problem solving. These functions are crucial to an agency's transparency, credibility, responsiveness, accountability, and accessibility, and overall ability to successfully maintain public support and legitimacy."⁴

The United States' Fair and Just Prosecution⁵ similarly advocates that the community should be treated as "co-owners" of oversight work. Establishing this kind of co-ownership model can help an agency both withstand resistance from antagonistic stakeholders and build consensus with allies. The desired relationship is described as follows:

"Ideally, civilian oversight entities should seek input as well as support from all stakeholders. A shared commitment to transparency and accountability in working to build community trust and promote effective policing can play a crucial role in enhancing the oversight entity's effectiveness. Conversely, government officials and bodies can undermine the effectiveness of civilian review models; so too, resistance from police unions, prosecutors, or other law enforcement personnel can hamper the oversight entity's ability to meaningfully carry out its duties [....]

The oversight entity, process, and mechanisms must be accessible and accountable to the public. To that end, civilian oversight entities must engage in robust community outreach and involvement [....] Key to meaningful civilian oversight are transparency, accessibility, accountability, and ongoing community involvement in the oversight body's core work, governing boards, and in other key capacities community stakeholders may identify. The community must have a seat at the table and be co-owners of these entities. Community accessibility and engagement can serve a vital role in

⁴ *Thirteen Principles of Civilian Oversight*, National Association for Civilian Oversight of Law Enforcement (1 June 2020).

⁵ The Fair and Just Prosecution is an American non-profit organization which brings together elected, local prosecutors as part of a leadership network committed to promoting a justice system grounded in fairness, equity, compassion, and fiscal responsibility.

withstanding resistance by key stakeholders, in building public consensus in favour of strong oversight, and ultimately, in establishing and maintaining civilian oversight entities empowered to achieve the twin objectives of accountability and transparency in practice."⁶

These resources suggest that the more the community is accepted by an oversight process as a true partner, the greater the benefits of such a partnership may be.

Accordingly, for the IPCA to engage with the community in the way they would ideally want to and in a way that is consistent with best practices in this area, as suggested above, they may need to invoke what might be described as a paradigm shift, or a massive change.

Such a shift for the IPCA would involve challenging the somewhat entrenched historical perspective that seems to currently exist within the office – that receiving more complaints, even appropriate complaints, is inherently challenging because it could generate more work. Thus, a true paradigm shift could move the organization from the current underlying assumption that receiving more complaints presents a challenge to a position that more robust community engagement could be beneficial.

In reality, more complaints may or may not be received. But the issue of needing to request more resources to handle more work could be addressed in various ways. It may be obvious that the Authority could legitimately need the extra bodies and/or manpower to be able to handle the work demanded of them. In this instance, given the critical nature of the IPCA's work, any official request for additional resources would likely stand a solid chance of being granted, even in the era of overall resource constriction currently being experienced throughout New Zealand.

In addition, the office could amplify its public profile overall if community engagement starts to occur in a more consistent manner. On the whole, the IPCA could likely expect more people to become more familiar with the role and functions of the office, as well as what specific issues the Authority is, *and is not*, able to address, potentially even leading to fewer complaints. The IPCA also might be able to collect additional data points to justify its engagement functions – such as an increase in public contacts, public events, and media requests. As a result, the office's reputation, in fact, could be elevated, not negatively impacted. In addition, if needed, the office could potentially conduct an assessment of how work is being managed internally to be able to effectively meet its new goals.

Finally, it is important to recognize that quality community participation is desired over simply an increase in participation numbers, as an ultimate goal. Quality participation cannot occur unless some time is spent on the front end of any engagement process to "ensure that a participant's time is well spent. This means ensuring that a process has focus and clarity of purpose, that participants' needs are

⁶ Promoting Independent Police Accountability Mechanisms, Fair and Just Prosecution (June 2021).

fully aired and considered and that their level of influence in the process – what can be changed as a result of it – is clear from the start."⁷

B. Public Education around Process, even if Investigations Themselves Remain Confidential, Generates Trust and Accountability

Community engagement is also important for purposes of enhancing public trust and legitimacy. Perhaps most critical when applied in a civilian oversight context, public education specific to process is possible, and sharable, even when confidential information cannot be revealed.

Sharing information about process alone can foster transparency, build public trust, allow for informed citizen participation, improve decision-making quality, and enhance public delivery of services by enabling public feedback and identifying potential concerns within the process.

One request frequently received by civilian oversight agencies from complainants is for specific information contained in complaint investigation files. Very commonly, due to strict confidentiality laws governing these investigations, and given that such investigations pertain to a police officer's personnel file or otherwise contain sensitive details and information, it is not possible to disclose the specific content from these documents and/or the documents themselves.

However, just because the content of such files remains confidential, information still can be shared publicly. General public knowledge of the complaint investigation process – as far as details, timing, and what to expect in being a participant going through that process – can have immense value for those who may be interested in knowing more about the how civilian oversight functions, or about what they may experience if they ever have a complaint. Confidentiality is also a two-way street, as preservation of identity remains critically important for complainants at times as well.

In addition, by communicating with the community about process issues, civilian oversight professionals are able to inspire members of the public to feel as though they have a voice, and an opportunity to be heard, consistent with the principles of due process.

Improved outcomes relating to public trust can also result from community engagement efforts specific to generating public understanding of the process:

"Community engagement can lead to improved outcomes for communities when government organisations and public decisionmaking entities seek out the aspirations, concerns and values of communities, who, in turn, share their aspirations, concerns and values with governing entities. Incorporated into decision-making

⁷ *People and Participation*, Involve, p.12.

processes, public decision makers are better informed and better able to meet community needs.

Establishing long standing, effective partnerships between government organisations and communities, too, results in a greater sense of community ownership and an improved uptake of services as they are tailored to the unique aspirations of the community."⁸

The IPCA, thus, should initiate a community engagement strategy in the near future, if possible, given the multitude of public-oriented benefits that can result from doing so.⁹

II. Comparative Jurisdictional Study

Outside jurisdictions can provide a fascinating point of contrast and comparison to the IPCA for purposes of understanding how other offices are carrying out the task of community engagement. A number of case studies are therefore presented. First are comparable offices overseeing national/regional policing forces, followed by a comparison study of the LAPD OIG, and finally a look at some other agencies doing innovative work in the community engagement space in New Zealand.

A. National/Regional Policing Counterparts – Oversight Models and their Community Engagement Strategies

1. Law Enforcement Conduct Commission in Australia

The Law Enforcement Conduct Commission ("LECC") in Sydney, Australia¹⁰ oversees the New South Wales ("NSW") Police Force with approximately 120 total staff.¹¹ The Director of Prevention, Legal and Engagement and the Acting Manager of Prevention and Engagement relayed a number of recent significant community engagement efforts:

• **Staffing** – The office staffs a community engagement officer who handles all media releases and requests for official statements. This person also provides advance notice to the media when a public report is published and is responsible for distributing the report to the media.¹²

⁸ Why is Community Engagement Important, Granicus (28 March 2025).

⁹ Such a strategy for the IPCA might include, at a minimum, re-engaging on social media platforms, broader distribution of public reports, and some focused introductory meetings with an array of diverse community groups.

¹⁰ LECC website, retrieved (7 March 2025), from: https://www.lecc.nsw.gov.au/

¹¹ As a point of comparison, the IPCA employs approximately 45 people.

¹² One recent newsworthy report published by the office was a review of Body Worn Video standard procedures, which uncovered a variety of deficiencies with regard to how NSW Police were operating their cameras. Ea (7 March 2025).

The office hired two Aboriginal Engagement Officers ("AEOs") approximately one year ago. These officers are Aboriginal by background (a requirement for the job), and are responsible for engaging with these communities, given that Aboriginal people in Australia are typically overrepresented as far as increased contacts with police and in Australian jails. The AEOs are responsible for elevating visibility of the LECC in other communities beyond just Aboriginal communities. They gather information about issues that community members have with the NSW Police Force. The AEOs also help to bridge gaps between community expectations and LECC work. The role of the AEOs was described as providing "assurance in the process" of the LECC's work.

Engagement – There are also different levels of engagement being conducted by the LECC. Community engagement staff lead conversations with small agencies, regional groups, and legal stakeholders, either in person or online. When conducting such meetings in person, they travel to remote areas where constituents typically have little awareness about the office or what they do, so they try to announce their plans in advance as much as possible. The LECC believes that a combination of word of mouth and contacting various Legal Aid groups and/or Aboriginal resources they already have a relationship with enables them to effectively promote their presence ahead of time. One example provided was a recent trip to a small mining town in the Australian outback, Broken Hill. The LECC referenced this as a positive experience, as far as being able to educate that community about the role of the office and further being able to hear about issues the community is experiencing with regard to their law enforcement encounters. Staff also noted that different communities experience different issues and that it's important to speak with some fluency within these various communities.

Community engagement staff also engage with legal stakeholders such as the judiciary, prosecutorial groups, Legal Aid, the Aboriginal Legal Service, and private law firms, which are typically aware of the office's existence, but who may not have the best sense of the parameters of the work of the LECC or how the office might be able to directly benefit clients. These meetings generally function as informational sessions for the attendees but also provide an opportunity for LECC representatives to solicit feedback about issues of concern for communities and practitioners.

• **Resources** – LECC staff typically have some merchandise in their possession when attending community events. These various items – water bottles, keychains, notepads, and fridge magnets – are extremely popular among community members upon receipt. All objects have the LECC's logo on them and some, such as the notepads and fridge magnets, include the office's website details and are publicly disseminated as needed. Although such merchandise requires a small budget, LECC staff felt that these small items pay strong dividends toward establishing channels of future communication with potential complainants.

• Website – The LECC posts helpful resources on its website for journalists in particular, specific to what information is, and also what is not, available to receive.¹³

The LECC is similar in function to the IPCA in that both offices handle oversight of complaints as well as produce more broad-scale research and systemic reviews of patterns and practices they might be seeing across all cases, even where complaints are not necessarily sustained. Whilst legislation provides that the majority of complaints about police misconduct are handled by the NSW Police Force, LECC also undertakes investigations of complaints where thresholds of serious misconduct and/or systemic issues are met.

Despite the robust engagement the LECC is conducting, especially in the last year since the AEOs have been hired, it is difficult for LECC staff to directly associate any increase in the office's complaint numbers to their community engagement activities alone. Anecdotally, they can point to the fact that their complaint numbers have increased slightly in the last year, and they feel they have more people calling into their office to file complaints. But they are not certain that this increase can be directly tied to any additional community engagement efforts they have been making.

Staff seemed interested in the possibility of starting to track any potential increases in complaint data, specifically in Aboriginal populations making complaints, comparing the time before and after the AEOs started their work. However, the LECC has not started tracking this data.

The office recently re-constituted its entire complaint intake operation and seemed to feel strongly that if complaints increased exponentially, for any reason, office management would review internal workflow processes to determine how adjustments could be made to handle such an increase.

2. Civilian Review and Complaints Commission in Canada

The Civilian Review and Complaints Commission ("CRCC")¹⁴ in Canada, which employs approximately 100 staff, is the independent civilian oversight body for the Royal Canadian Mounted Police ("RCMP"), which provides services at the federal, provincial, and municipal levels in communities across Canada. Most Canadian provinces and territories also have different municipal, as well as sometimes provincial, police forces, and there are other oversight bodies which operate at the municipal and provincial level as well.

The CRCC is currently in the midst of a structural transition whereby new legislation passed in October 2024 – the Public Complaints and Review Commission Act – mandates that the CRCC will eventually transition to being a new entity called the Public Complaints and Review Commission, which will have oversight of the RMCP in addition to the Canadian Border Services Agency. Another significant change

¹³ LECC website, retrieved (7 March 2025), from: https://www.lecc.nsw.gov.au/media-hub

¹⁴ CRCC website, retrieved (12 March 2025), from: https://www.crcc-ccetp.gc.ca/

provided by the Act is that previously, the CRCC was tasked with public education as something it *may* do. The legislation now makes public outreach *mandatory*.

The CRCC currently employs four full-time positions, which are critical to its community engagement function -1. A Manager of Partnerships and Engagement, who is supported by two staff; and 2. A Senior Indigenous Relations Advisor, who is responsible, specifically, for engagement with Indigenous populations throughout Canada. There are ten communications related positions overall.

The Manager of Partnerships and Engagement is the first ever such position for the office and was hired into her position in April 2024. She spent eight years prior to her work at the CRCC as a manager and senior communications advisor with Indigenous Services Canada.¹⁵

The Senior Advisor for Indigenous Relations is also the first ever such position for the office and was hired into her position in February 2024. She spent eight years prior to her work at the CRCC working with the RCMP in operational settings and at National Headquarters in various roles pertaining to Indigenous Policing and national reconciliation initiatives.

The Partnerships and Engagement team is currently in a "building stage," given the Manager being relatively new, and the office is also currently without an overall executive management Chairperson, similar to the IPCA. Nevertheless, various engagement efforts have been initiated in this short time:

• Engagement in Nunavut around the release of a particular report – The CRCC may, on the request of Canada's Minister of Public Safety and Emergency Preparedness, or on its own initiative, conduct a review of specified activities of the RCMP. Following conversations with the Government of Nunavut, one of Canada's northern territories, the CRCC initiated a review of the RCMP's handling of public complaints in the territory in 2022. Nunavut has the lowest number of complaints filed of any of the Canadian provinces and territories and a large Inuit population – one of the three Indigenous peoples of Canada.¹⁶ The published report, released in November 2024, contains a specific recommendation, among others, that the RMCP should work with the CRCC to "build awareness of the public complaint system and improve its accessibility."¹⁷

Prior to the public release of this report, the CRCC engaged with two national Inuit advocacy groups to brief them on the release of the report and discuss engagement activities in the territory. Following this, the Partnerships and

¹⁵ Indigenous Services Canada website, retrieved (12 March 2025), from: https://www.canada.ca/en/indigenous-services-canada.html

¹⁶ The report can be found at the CRCC website, retrieved (12 March 2025), from: Specified activity review of the RCMP's handling of the public complaint process in "V" Division / Nunavut | Civilian Review and Complaints Commission for the RCMP.

¹⁷ *Id.*, at Recommendation 6.

Engagement Manager and Senior Indigenous Relations Advisor also attended a major community event and trade conference in the Nunavut area in an effort to increase awareness of the public complaint process and build community relationships amongst all Nunavut residents.

CRCC staff assembled outreach material prior to the event, which included, among other items, CRCC office brochures and complaint forms translated into Inuktitut, one of the official Inuit languages of the territory.¹⁸ Following release of the report, a copy of the report and these informational items were also sent to legislative and municipal contacts in the region to increase awareness of the public complaint process and assist community leaders with providing information to citizens.

- Newsletter to Indigenous communities The Senior Indigenous Relations Advisor is also in the process of piloting an external newsletter for the office, which the CRCC believes will be a crucial tool in communicating with Indigenous people throughout Canada more effectively. Given that there are three distinctions amongst Indigenous people in Canada (First Nations, Inuit and Métis), including over 600 First Nations, the CRCC has created this plainlanguage newsletter as a direct outreach product designed to increase familiarity with the complaint system and share important information in an easily digestible manner.
- Oversight process flowcharts CRCC staff are also in the process of developing work-related flowcharts, in conjunction with other oversight entities across Canada, to further enhance public understanding around how CRCC work overlaps with, and can be distinguished from, these other agencies; relay who is responsible for what type of oversight; and better explain the distinct mandates that each entity must operate under. When these flowcharts are complete, they will be publicly disseminated.
- Collaboration with the police service it oversees The CRCC also regularly coordinates with the RCMP to ensure that informational materials about the public complaint process are available across Canada in all RCMP detachments, or areas.
- Annual meetings The CRCC participates in an annual oversight conference, hosted by the Canadian Association for Civilian Oversight of Law Enforcement (CACOLE). The CRCC also hosts a "heads of agencies" meeting once a year, which brings together the leadership of police oversight agencies across the country. The Senior Indigenous Relations Advisor and two CRCC executives also attended the Indigenous Policing Forum in September 2024 to build relationships with community partners and learn about insights and updates that impact Indigenous police services.

¹⁸ The CRCC complaint form is currently available in 16 different languages.

CRCC staff advised that they need more data to be able to attribute any particular increase in complaints to any specific community engagement efforts being conducted by the office. While CRCC staff has noticed a small increase in the total number of complaints being filed since engagement began in Nunavut in 2019, they believe it would be speculative to draw any definite conclusions around any particular reasons why such an increase occurred at this point.

B. A Local Civilian Oversight Model – the LAPD OIG

It is potentially useful to compare the IPCA to the oversight system most familiar to me, the Office of the Inspector General for the Los Angeles Board of Police Commissioners,¹⁹ the office responsible for oversight of the Los Angeles Police Department ("LAPD"). In the past 12 years since the community relations section was established within the OIG as an institutionalized role and function, our Community Relations and Strategic Initiatives staff has made significant progress, as far as reaching out to varied community stakeholders around the City of Los Angeles, which is roughly the same size, in terms of geography and population, as New Zealand.

The main differences between the LAPD OIG and the IPCA include the following -

- **Overall philosophy** The OIG and the IPCA employ different overall philosophies about the critical importance of community engagement. The OIG's approach to community engagement is arguably one of regular routine versus an apprehension-based approach adopted by the IPCA when it comes to being able to handle the work that may be generated from reaching out to the community. The OIG espouses a more customer service-oriented style of being out in the community in contrast to the IPCA's practice of being less public-facing.
- **Priorities** Each office conducts its work in different ways as well staff at the IPCA spend the vast majority of their time on investigations and reviews of complaints, while the corporate management team does little community engagement. Comparatively, at the OIG, either the Inspector General conducts solo outreach efforts or delegates these duties to staff. Among OIG staff, there is generally an attitude that we must work with the resources we have, and we are not necessarily going to get more. A general understanding exists that while the more experienced members of the OIG are typically entrusted and charged with the community engagement function, it's everyone's responsibility to be public representatives of the office. Further to this concept, the OIG has a quarterly requirement for all staff to participate in a community or LAPD-oriented function, as office leadership believes it's important for OIG staff to be visible, both to the Department and within the community. Thus far, the OIG has found that requiring staff to engage with stakeholders, especially LAPD, enables a de-mystification process to occur.

¹⁹ OIG website, retrieved (28 April 2025), from: https://www.oig.lacity.org/

Given that agencies everywhere are being challenged by decreased (or certainly stagnant) revenue streams going forward, it is not out of the question that the IPCA may find itself in an inevitable position of needing to adopt this kind of an approach going forward.

- Staffing For the past 12 years, the OIG has dedicated two of its 30-member investigative staff to the office's community engagement function, one working full-time, and a second splitting time between community relations and audit work in a different section. Community engagement staff are responsible for managing all community outreach and strategic initiatives, as well as executing office-wide engagement goals for the OIG. They are also charged with production, management, and maintenance of the office's website, social media, and mobile "app." They spearhead high-level, strategic meetings and community groups, and other individuals. They are also responsible for responding to media inquiries, public information requests, and questions from outside civilian oversight agencies, academics, and other interested parties conducting research about best practices and specific issues related to civilian oversight of law enforcement.
- **Complaint investigation timeframes** The IPCA conducts original investigations of complaints and at a very comprehensive and high level, but investigations can potentially continue for multiple years. Meanwhile, civilian oversight professionals working in the City of Los Angeles are bound by a one-year statute of limitations under California state law that essentially mandates most investigations be completed within one year. The OIG also sends the vast majority of complaints received by our office to LAPD for investigation, maintaining, typically, only complaint investigations alleged against the Chief of Police for ourselves. Meanwhile, IPCA investigators can spend arguably more time on their reports and investigations than they might otherwise, if some legal obligation to complete investigations within a certain timeframe was in place.
- **Receipt of complaints** The LAPD OIG maintains an extremely low bar to entry with regard to acceptance of complaints. Complaints can be filed through any existing avenue – in person, by email or regular mail, through phone, fax, social media, or the OIG's mobile app. Meanwhile, the IPCA typically receives most of its complaints through regular notification from Police of existing investigations, via public emails, or the occasional office visitor. The IPCA sporadically receives complaint referrals from other public agencies and also receives a number of internal complaints directly from Police officers.²⁰

²⁰ These internal complaints are referred to as "Section 31" complaints, given how they are characterized in the Memorandum of Understanding that pertains to New Zealand Police.

• Social media – Social media pages for the LAPD OIG are available on multiple platforms, including Facebook, X, Blue Sky, Threads, YouTube, and Instagram.

In thinking about the effectiveness of the OIG's community engagement and how such efforts can be measured, several factors can be considered.

First, OIG staff do not necessarily know about potential problems within LAPD unless we are told. Connecting with the community expands what we are exposed to, as far as being able to ascertain tangible risk management issues. In speaking publicly, actual anecdotes are typically relayed to OIG staff, which provide us with a more informed way of going about our work and selecting worthwhile projects.

Secondly, despite the fact that measuring the effectiveness of the OIG's community engagement can be difficult, our efforts can be measured through:

- a. Evaluating the number of complaints received, as well as the quality of complaints received. (Are people complaining about things that the LAPD and/or the OIG has appropriate jurisdiction and authority over?)
- b. Evaluating how the office is being reported on in the media. (Is media coverage accurate and well-developed?)
- c. Determining if the work and functions of our office are being emulated by other similar offices. (Are the methods by which we are conducting our work and/or community engagement functions being replicated or are such practices highly sought after by similar offices?)

Some impacts with regard to community engagement cannot be measured at all or will not be measured right away. Treating everyone spoken with publicly as a potential complainant, however, improves the chance that they will know how to find the office and make a complaint, if appropriate, in the future – potentially, years down the line.

C. Other New Zealand Offices

Although the organizations described below are not exclusively engaged in the specific work of civilian oversight of law enforcement, these offices within New Zealand are relatively comparable to the IPCA, and/or have implemented successful public engagement campaigns to achieve community buy-in. The examples below suggest that small, outward efforts can establish trust with the community, solidify the role of an office publicly, and amplify the work they are doing.²¹

²¹ Agencies were selected based on a combination of known, successful community engagement efforts, independent research, and preferences of the IPCA Board upon first hearing about the details of this project.

1. Office of the Ombudsman

The Office of the Ombudsman handles complaints regarding most other New Zealand entities in the public sector aside from Police, among a host of additional responsibilities.²² Although the office is considerably larger than the IPCA, it also completes a large number of complaint investigations each year (6,269 were completed in Fiscal Year 2023-24.)

The office employs approximately 240 staff, which includes a small unit of six dedicated community engagement professionals – Rōpū Māori Hononga Hapori – the Community Outreach and Engagement Group – which formed approximately four years ago. Among these six, there is one Director, one Principal Advisor, and three Senior Advisors with individual portfolio responsibilities (Māori, Pacific, Asian, each with specific backgrounds and identities conducive to their roles). The group is supported by a team administrator.

Ombudsman staff in this group emphasized that despite their individual titles and although they do respond to the specific communities they represent and serve, they also try to maintain an inclusive approach, such that they are responding to all complainants, regardless of individual background, consistently and empathetically.

While the Ombudsman has a broad legislative function as part of its mandate, ongoing public engagement efforts with the Māori, Pacific, and Asian communities include the following:

- **Public meetings** Outreach and Engagement staff attend engagement events on a quarterly schedule, such that four regions in New Zealand are visited each year – there are 12 in all – and the complete circuit is completed within three years. Typical attendees include a vast array of community providers. Extensive pre-planning goes into each "event," which lasts up to two weeks in duration and may involve up to 17 different meetings throughout that time.
- **Individual engagement** Outreach and Engagement Group staff respond to various requests for service from complainants and try to administer advice and information as appropriate, taking cultural considerations and sensitivities into account.
- **Public appearances** The Outreach and Engagement Group is also charged with engagement-related scheduling for the Chief Ombudsman. Such scheduling pertains to sector level engagement as well as helping the Ombudsman feel comfortable in all speaking roles, meetings, and community spaces. To facilitate this task, the Outreach Group has established strong relationships within the communities they serve. They indicated that they are "invited into the tent only because of [their] deep relationships."

²² Office of the Ombudsman website, retrieved (2 April 2025), from: https://www.ombudsman.parliament.nz/what-ombudsman-can-help

- Office materials Office materials, including the office's complaint form, are continually being revised and improved over time with a focus toward using language that is as simple as possible, while still being useful to complainants.
- Social media Social media pages can be found on Facebook, LinkedIn, as well as other platforms, and enable the office to share their activities and work, however staff feel as though the language and style of posted content is continually evolving.

Staff emphasized several additional points. First, that any community engagement strategy must be matched with capability. Second, that while the Office of the Ombudsman generally adopts a black and white legalistic approach, the Community Outreach and Engagement team focuses more on developing a cultural mindset and behaviours that support a more holistic, people-centric approach. The team "works in the grey" rather than treating each person as "just another complainant." Given their focus in these areas and ability to provide personalized attention to complainants, trust is enhanced, and their community relationships endure.

Staff suggested that the IPCA attempt to target communities (e.g., Māori and other overrepresented groups in the criminal justice system) that may not know about the services the IPCA is able to provide and who may benefit accordingly.

Ultimately, the Ombudsman staff indicated it would be difficult to quantify any increased number of complaints and/or workload attributed to the office as a direct result of the engagement efforts they have been involved with over the past four years. They do not track such data. However, staff felt confident and hopeful that people better know where to turn if they needed help or wanted to file a complaint in the future.

2. Office of the Privacy Commissioner

New Zealand's Office of the Privacy Commissioner ("OPC")^{23 24} is similar to the IPCA in several ways. The office staffs approximately 50 employees, receives complaints, and is quite limited as far as the information they are able to release publicly. The office has three dedicated staff positions which comprise their Communications team, including one Communications and Engagement Manager, who started in her position approximately two years ago.

²³ Office of the Privacy Commissioner website, retrieved (14 March 2025), from: https://www.privacy.org.nz/

²⁴ The IPCA and Office of the Privacy Commissioner, in addition to having similar sized office staffs and a somewhat similar mandate, have previously collaborated on a joint inquiry specific to Police overstepping their authority when taking photographs of Māori youth. A September 2022 report found, among other things, that "Police were not justified in photographing [children, otherwise known as ranagatahi], as the photographs were not necessary for a lawful policing purpose. [The report] also found that, in these incidents, Police had not properly sought consent from the rangatahi or their parents or caregivers before taking the photographs, and had not adequately explained why the photographs were being taken and what they would be used for." *Joint inquiry by the Independent Police Conduct Authority and the Privacy Commissioner* (September 2022).

OPC is also engaged in multiple community engagement activities:

- **Public engagement** Staff conduct a variety of public speeches and presentations, generally to the corporate and government sectors. Attendees are generally trying to better understand the value of privacy and not wanting to disclose people's confidential and private rights. A compliance-based mentality is said to drive a significant portion of requests for OPC to speak at various events and meetings. One example was from a university, which had questions about how to best handle privacy issues involving students with risk-oriented situations, like suicide and eating disorders.
- Social media OPC has an active, though limited, presence on social media. While they do maintain a Facebook page, the office recently deactivated their social media accounts on Twitter and Instagram, given that they were not able to actively produce sufficient and/or consistent content, combined with not having sufficient staff with the background and/or skills to be able to maintain these accounts. On Facebook, despite maintaining their office's basic profile page, an auto-generated message pops up to re-direct potential complainants to contact the office by email. OPC posts more regularly on LinkedIn, which it finds to be more manageable, given that this platform tends to attract their target audience of privacy professionals, lawyers, and businesspeople.
- Policy campaigns OPC's policy work has considerable public impact. One recent example of a policy related campaign involved how the use of biometric technology should be regulated to protect privacy rights.²⁵ In late 2024, the Privacy Commissioner announced the development of a code of practice for biometrics to create more specific rules for agencies using biometric technologies to collect and process biometric information. The Communications and Engagement Manager emphasized that as part of this campaign, it was important to use plain language given the critical nature of people being able to understand the issues implicated by this complex topic. The office did not spend any money whatsoever to generate media interest in this initiative; they simply drafted a press release and website content, and also created an infographic as well as other shareable graphics, all using Canva, which cost \$280 to maintain a license.
- **Community feedback** OPC also recently initiated a community feedback mechanism, referred to as the Māori Reference Panel. The panel consists of well-known representatives of the Māori community selected for 18-month terms to serve the OPC by weighing in on various policy questions and other issues of concern to their communities. A range of iwi, age, and gender is

²⁵ Office of the Privacy Commissioner – Biometrics Program website, retrieved (14 March 2025), from: https://www.privacy.org.nz/resources-2/biometrics/

represented on the panel, which has met twice since late 2024 on a quarterly basis.

- Office materials The Communications and Engagement Manager also relayed that she has been in the process of modernizing the office's public-facing materials and technology over time. She has been updating the office website to make it more aesthetically pleasing and understandable to the average person. She has also been working consistently to execute efforts outlined in her community engagement plan.
- Free webinars Finally, the OPC hosts an annual Privacy Week event, which involves online, free privacy related webinars. The webinars are available at zero cost to everyone in New Zealand and are organized according to three experience levels. Participants are also able to ask questions at the end of each session. The most recent Privacy Week attracted approximately 5000 total participants.

Regarding the question of whether the OPC's engagement efforts have generated more work for the office overall, it is difficult to draw any definite conclusions. However, the Engagement Manager provided an example of how the New Zealand Office for Seniors reached out to ask if OPC had any content they could insert into their monthly newsletter. The promotional material related to the biometrics program was provided, which did eventually result in a number of new email contacts from seniors, but only in the immediate aftermath of the newsletter being published. However, despite this small increase in emails received, it helped staff understand the information gaps that existed, as far as what people did not understand or know. Thus, despite an increased number of emails, the feedback received in this process ended up being incredibly useful to the office overall.

The Engagement Manager ultimately said that because the OPC creates solid content and makes defensible decisions, they stand on solid ground as far as the office's approach to community engagement, even if what they are doing does not necessarily please everyone.

3. Environmental Protection Authority

The New Zealand Environmental Protection Authority ("EPA")²⁶ is a government agency responsible for regulating activities that affect New Zealand's environment.

The office has one Principal Community Engagement ("CE") Lead and a full staff of approximately 200 people. The CE Lead was formerly part of an Insights Strategy and Engagement ("ISE") Team within a broader Engagement Group. However, recent changes in government priorities led to a restructuring of the Engagement Group, with its Communications and Ministerial Engagement teams becoming part of a Corporate Services Group, and the dismantling of the ISE team. The CE Lead position now sits under a separate Māori Engagement Group – called

²⁶ Environmental Protection Authority website, retrieved (24 March 2025), from: https://www.epa.govt.nz/

Kaupapa Kura Taiao²⁷ – where she conducts community engagement for the EPA, primarily through the delivery of the EPA's Community Science Program.²⁸ On the whole, Kaupapa Kura Taiao provides support and advice to iwi²⁹ and applicants during the engagement process and raises awareness with iwi on how to engage and participate in the decision-making processes of the EPA.

In the last five years, the EPA has engaged in some creative outreach efforts geared toward the public, mostly thanks to the CE Lead and the mandate of the Engagement Group.

• **Public initiatives** – In 2022-23, the EPA ran an exhibition referred to as "Cutz and Kōrero" at a public event called National Fieldays, offering free haircuts in exchange for public conversations about efforts to protect the environment. Complementing this exhibition, they then created "haircut videos" for the EPA website based on information gathered at the event.³⁰ To facilitate this, the EPA worked with a professional hairdresser and performance artist who offered to cut people's hair (often in farm environments such as shearing sheds and stock yards) while they casually chatted with EPA staff about science and environmental issues they cared most about. Thoughts shared during these encounters were collected for approximately two years with the intent to bring "the outside in" to the EPA, helping the EPA determine a positive "entry point" with the community by encouraging constructive dialogue around environmental protection issues.

The CE Lead indicated that the EPA has been supportive of her creative efforts and "outside the box" thinking, which the haircut videos illustrate.

• **Training** – The EPA Engagement Group also worked to adopt best practice principles for public participation by encouraging key staff to undertake the highly respected International Association for Public Participation training.³¹ Such training increased staff's confidence levels to speak more directly with stakeholders, as the course equipped them with the knowledge of appropriate processes to manage and de-escalate conflict when needed –

²⁷ The Māori Engagement Group ensures that representatives of the Māori community are adequately consulted and brought in as a critical part of the decision-making process of the agency.

 $^{^{28}}$ Open Waters website, retrieved (24 March 2025), from: Wai Tuwhera o te Taiao – Open Waters Aotearoa | EPA

²⁹ "Iwi" is specific to the Indigenous Māori of New Zealand, meaning "an extended kinship group, tribe, nation, people, nationality, race - often refers to a large group of people descended from a common ancestor and associated with a distinct territory." Retrieved (2 May 2025), from https://maoridictionary.co.nz/search?keywords=iwi

³⁰ Environmental Protection Authority Cutz and Korero website, retrieved (24 March 2025), from: https://www.epa.govt.nz/community-involvement/cutz-and-korero/

³¹ Staff were trained in principles outlined by the International Association for Public Participation. Iap2 website, retrieved (24 March 2025), from: IAP2 IAP2 Public Participation Spectrum - IAP2 Australasia

for example recognising when an issue should be handled as a formal complaint, or potentially otherwise, as an Official Information Act request.

- **Public information protocols** The EPA Communications team have processes in place to disseminate public information as quickly as possible using plain language and following accessibility protocols.
- Social media The EPA has a social media presence on Facebook, Instagram, LinkedIn, and Vimeo.

Anecdotally, the CE Lead shared her thoughts on the value of proactive engagement with place-based communities to improve regulatory outcomes – in that by building positive relationships, providing educational opportunities, and increasing awareness of issues (e.g., in relation to a regulatory function) communities are more likely to self-regulate – therefore decreasing the need for resource-heavy and expensive compliance, enforcement, and legal action. She emphasized that it is important to attempt to implement a variety of different public engagement strategies, and not be afraid to abandon unworkable approaches when they are not succeeding.

Although the EPA has quite a different mandate than the IPCA, the office's creative efforts with regard to community engagement are notable.

4. Serious Fraud Office

The Serious Fraud Office ("SFO")³² is the lead agency in New Zealand responsible for investigating and prosecuting serious and complex financial crime; the office also handles bribery and corruption charges. The SFO takes complaints from the public and also has an active community engagement function. The office employs a total of approximately 80 people, and currently has one Communications and Engagement ("CE") lead staff employed full time. This role will soon be re-occupied by a second staff member; accordingly, the current lead staff's contract has been extended for another six months, so for a short time, the office will reap the benefits of having two dedicated community engagement professionals in place.

The SFO only accepts approximately 0.2-0.5% of the 2000 complaints per year that it receives, on average. The acceptance rate is low primarily because the SFO has jurisdiction to handle a very narrow scope of complaints. A significant portion of complaints are referred to other agencies for proper handling. The SFO sometimes receives referral complaints for investigation from other agencies as well, such as Police or the Inland Revenue Department.

The office is involved with a number of significant engagement efforts:

• **Counter-fraud centre** – The SFO has a "counter-fraud centre" (established in approximately 2021) that manages counter-prevention work on behalf of the office. The centre is responsible for conducting trainings to public sector

³² Serious Fraud Office website, retrieved (10 March 2025), from: https://www.sfo.govt.nz/

agencies to raise awareness in the prevention space specific to financial crimes and education around fraud. The centre conducts seminars, webinars, and oneon-one workshops with agencies upon request. The private sector can also benefit from these services.

- **Traditional media** The SFO has an active media engagement strategy, where the office promotes significant case milestones, such as charges being filed or announcing when a case is being officially investigated. SFO staff have conducted a number of recent sit-down interviews with media, but only when there are substantive opportunities to speak openly about their processes.
- **Public engagement** The head of the SFO also has an active speaking engagement program regularly speaking to various business leaders and other similar audiences, like the Auckland Law Group, as these groups are most likely to have significant strategic impact for the office.
- **Training** The office also receives requests to conduct training from throughout the Pacific region.
- Social media In addition to traditional media efforts, the SFO has a presence on social media, mainly LinkedIn, given that this platform is where most of its target audience spends its time. Posted content typically relates to speaking engagements and meetings conducted by the office as well as promoting the activities and resources of the Counter Fraud Centre.
- Newsletter A plan is also in place to create an external newsletter communication that will be sent out publicly at regular intervals by email.

The SFO is able to draw a direct connection between its outreach efforts and specific complaints being filed, but because the number of complaints accepted by the office is such a small percentage of the complaints that they receive overall (they accept approximately 12-16 cases per year), it is difficult to attribute any concrete connection between recent engagement efforts and any rise in complaint numbers, year to year. That said, the CE lead indicated that there had been a noticeable increase in the office's social media followers and website engagement subsequent to certain media interviews conducted by the head of the office.

In general, the SFO is similar to the IPCA in that there has traditionally been a reluctance to focus outwardly on raising its own profile, and the office has been somewhat risk averse. According to the CE lead, scheduled speaking engagements provide a basic way of counteracting this reluctance to engage publicly, but more traditional community engagement efforts are more difficult, given that there is not as much familiarity with more public facing and consistent activity on behalf of the office.

The SFO continues to employ a general philosophy that it's better to wait until there's something of substance to say rather than over-scheduling interviews. The CE lead also indicated that a significant amount of planning and work is conducted on the front end of pitching media ideas to SFO leadership. He formulates detailed strategies that consist of outlining the planned activities in detail – listing everything from the

background, to the risks involved, how the opportunity is aligned with the agency's objectives, and why it's a valuable opportunity to pursue overall.

Conclusion

The IPCA can take some basic and discernible steps toward engaging more proactively with the community in the near future. Assuming collective will exists within the office to do so, the IPCA can start by utilizing its existing staff, materials, and resources and can scale towards a more in-depth community engagement function over time. Both options are feasible.³³ The most significant challenge is likely going to be the decision to initiate an engagement process altogether.

Although it may take a paradigm shift within the office to get started and reorient the IPCA's current thinking around increased complaint volume being inherently problematic, efforts to engage in meaningful fashion with the community can serve to enhance the legitimacy of the office and increase public awareness regarding value and function. As results from outside jurisdictions show, increased community engagement can lead to greater awareness, but not necessarily a huge spike in complaint volume. It's even possible that a reduction in complaints could result from a broader education campaign around what the office cannot assist with.

The IPCA ultimately provides a litmus test for purposes of ascertaining how a civilian oversight agency can raise its own profile, educate people as to its role and function, and thus, ultimately, increase public trust among an array of diverse stakeholders – all through some tangible and measured steps forward involving meaningful community engagement.

³³ For an in-depth discussion on various approaches the IPCA can take with regard to its engagement approach, please see the separate report drafted confidentially for the IPCA.

Bibliography

CRCC website, (retrieved 12 March 2025), from: https://www.crcc-ccetp.gc.ca/

CRCC website (retrieved 12 March 2025), from: Specified activity review of the RCMP's handling of the public complaint process in "V" Division / Nunavut | Civilian Review and Complaints Commission for the RCMP

Ea, Henry, *NSW Police Body Worn Camera System Riddled with Deficiencies*, LSJ Online (7 March 2025). Retrieved 7 March 2025 from: https://lsj.com.au/articles/nsw-police-body-worn-camera-system-riddled-with-deficiencies-report-reveals/

EPA website, (retrieved 24 March 2025), from: https://www.epa.govt.nz/

EPA Cutz and Korero website, (retrieved 24 March 2025), from: https://www.epa.govt.nz/community-involvement/cutz-and-korero/

Iap2 website, (retrieved 24 March 2025), from: IAP2 IAP2 Public Participation Spectrum - IAP2 Australasia

Indigenous Services Canada website, (retrieved 12 March 2025), from: https://www.canada.ca/en/indigenous-services-canada.html

Joint inquiry by the Independent Police Conduct Authority and the Privacy Commissioner into Police conduct when photographing members of the public (September 2022). Retrieved 14 March 2025 from: https://www.privacy.org.nz/assets/New-order/Resources-/Publications/Commissionerinquiries/8-SEPTEMBER-2022-IPCA-AND-OPC-Joint-Inquiry-into-Policephotographing-of-members-of-the-public.pdf

LECC website, (retrieved 7 March 2025), from: https://www.lecc.nsw.gov.au/

LECC website, (retrieved 7 March 2025), from: https://www.lecc.nsw.gov.au/media-hub

Office of the Inspector General website, (retrieved 28 April 2025), from: https://www.oig.lacity.org/

Office of the Ombudsman website, (retrieved 2 April 2025), from: https://www.ombudsman.parliament.nz/what-ombudsman-can-help

Office of the Privacy Commissioner website, (retrieved 14 March 2025), from: https://www.privacy.org.nz/

Office of the Privacy Commissioner Biometrics program website, (retrieved 14 March 2025, from: https://www.privacy.org.nz/resources-2/biometrics/

Open Waters Aotearoa website, (retrieved 24 March 2025), from: Wai Tuwhera o te Taiao – Waters Aotearoa | EPA *People and Participation: How to Put Citizens at the Heart of Decision-Making*, Involve, p.12. Retrieved 28 March 2025 from: kate_amended_file.indd

People and Participation: How to Put Citizens at the Heart of Decision-Making, Involve, p.20. Retrieved 31 March 2025 from: kate_amended_file.indd

Promoting Independent Police Accountability Mechanisms – Key Principles of Civilian Oversight of Law Enforcement, Fair and Just Prosecution, Copyright June 2021. Retrieved 19 February 2025 from:

https://www.fairandjustprosecution.org/staging/wp-content/uploads/2021/06/FJP-Civilian-Oversight-Issue-Brief.pdf

Serious Fraud Office boss: Fraud flourishes when financial strain and workforce disruption meet tech-driven opportunities (17 November 2024). Retrieved 10 March 2025, from: https://www.nzherald.co.nz/business/serious-fraud-office-boss-fraud-flourishes-when-financial-strain-and-workforce-disruption-meet-tech-driven-opportunities/GKIXHEYIMZFR5IXJICNOZNV7EM/

SFO website, (retrieved 10 March 2025), from: https://www.sfo.govt.nz/

Thirteen Principles of Civilian Oversight, Summary written and provided by the National Association for Civilian Oversight of Law Enforcement (1 June 2020). Retrieved 19 February 2025 from: https://www.lwm-info.org/DocumentCenter/View/4219/13-NACOLE-Thirteen-Principles_PrePublication_Summary

Why is Community Engagement Important, Granicus, (retrieved 28 March 2025) from: https://granicus.com/uk/blog/why-is-community-engagement-important/

APPENDIX 1 – Comparative Jurisdiction Summary

LECC (Australia)	
Resources	Effects
 Community Engagement Officer (1 staff). Aboriginal Engagement Officers (2 staff). Public Meetings (remote areas with high law enforcement contacts). Engagement with legal stakeholders. Oversight of complaints. Systemic reviews. Merchandise/swag. Social Media – LinkedIn and YouTube. Creative website with helpful community-oriented videos and other resources. 	 Direct engagement with media. Direct engagement with specific communities. Staff representation of specific communities and ability to build trust. Effective promotion of public meetings in advance (via word of mouth and specific engagement with known Aboriginal groups). Budget needed to support dedicated engagement staff and merchandise.
Results	Workload Changes
 Input received regarding community encounters with law enforcement. Bridging gaps between community expectations and LECC work. Ability to educate communities regarding role and function of the office. Ability to solicit specific feedback from Aboriginal and legal communities, especially as to what sorts of complaints to focus on. 	 Small, recent increase in complaints (but anecdotal evidence only). Interest in starting to track complaint intake based on timing of AEOs starting their work.

CRCC (Canada)	
Resources	Effects
 Mandatory public engagement, per legislative authority. Manager of Partnerships and Engagement (1 dedicated staff and 2 support staff). Senior Indigenous Engagement Advisor (1 dedicated staff). Public meetings about report relevant to Indigenous communities. Periodic systemic reviews. Information packets disseminated at events (including office brochures and complaint forms). Annual participation in national civilian oversight conference (CACOLE) and other regional meetings. External newsletter (in process). Workflow information charts (in process). No social media (yet). 	 Direct engagement with specific communities. Staff representation of specific communities and ability to build trust.

Results	Workload Changes
 Improved communication with Indigenous communities (information presented in more digestible way via newsletter). Collaboration with RCMP to ensure CRCC office information is available throughout Canada. Enhanced public understanding of different oversight agencies (ongoing via workflow information charts). 	 Small, recent increase in complaints (but anecdotal evidence only, since 2019 after specific engagement with Indigenous community). More data is needed to be able to attribute an increase in complaints to specific engagement efforts of the office.

LAPD OIG (United States)	
Resources	Effects
 Community Relations Coordinators (2 staff, one splits time with OIG Audit Section). Public meetings with various internal (City/LAPD) and external (legal, academic, non-profits) stakeholders. Oversight of complaints, uses of force, and systemic reviews involving audits and other inspections. Complaint investigations involving misconduct allegations against the Chief. Merchandise/swag. Mobile "app." Extremely low bar to entry for complaints (complainants can file via social media, email, phone call, fax, in-person visitation, etc.) Liaison with regional oversight offices. Staff participation in public-facing quarterly activities. Social Media – Facebook, X, YouTube, Blue Sky, Threads. 	 Outward facing and customer-service oriented community engagement approach. More experienced staff typically entrusted with community engagement role, but staff understand it's everyone's responsibility to be public representatives of the office. Bound by a one-year statute of limitations under California state law – mandates most investigations be completed within one year. Thus, investigations are generally completed in a timely manner.
Results	Workload Changes
 Community-driven work and projects. Limited number of Complaint Section staff (6) allows for limited case review capacity. The OIG sends the vast majority of complaints received to LAPD for investigation, maintaining, typically, only misconduct allegations lodged against the Chief of Police. 	• It is not possible to attribute any increase or decrease in complaint calls and/or complaints overall being filed with the OIG to any particular community engagement efforts, though this has not been specifically studied and/or tracked.

Office of the Ombudsman (New Zealand)	
Resources	Effects
 Community Outreach Group – 6 dedicated staff (3 of whom are dedicated to specific community groups – Māori, Pasifika, and Asian communities). Respond to specific issues within each community yet utilize inclusive and consistent approach regardless of community. Social media (Facebook, LinkedIn, etc). 	 Direct engagement with communities – quarterly schedule (12 regions throughout New Zealand; 4 visited per year). Engagement events are scheduled for 1-2 weeks each. Broad legislative function. Culturally relevant, daily advice and information is provided to complainants. Outreach Group is responsible for engagement schedule for Chief Ombudsman. Work consistently on improving office materials over time.
Results	Workload Changes
 Uplift cultural considerations as complainants navigate interactions with staff. Establish that Ombudsman has a comfort level in all engagement spaces. Emphasis on bringing community into conversation in substantive manner and building sustainable relationships. 	 Difficult to quantify any correlation between complaint workload increases and community engagement efforts, as data is not tracked. As a result of engagement efforts, staff has increased confidence that people know where to go if they do have a complaint.

Г

Office of the Privacy Commissioner (New Zealand)	
Resources	Effects
 Communications Team – (3 dedicated staff, including the Communications and Engagement Manager). Craft public speeches and presentations (mainly corporate and government sectors). Typically focused on preventing disclosure of confidential rights. Social media – primarily LinkedIn (target audience) and limited presence on Facebook. Policy work agenda (example: more stringent rules around privacy rights implicated by biometric code and education around this topic). Community feedback mechanism, the Māori Reference Panel, formed late 2024 – meets quarterly; members serve 18-month terms. 	 Emphasis on utilizing plain language and having helpful resources accessible given complexity of topics. Create press releases and infographics with no cost (created with Canva). Consistent work to update all public facing office materials, including the office website, to make it more aesthetically pleasing.
Results	Workload Changes
 Māori community has direct input into policy questions and a voice regarding issues of importance to them. Host annual Privacy Week Event webinars (free to anyone in New Zealand). 	 Difficult to draw definite conclusions as far as any correlation between increased complaint numbers and community engagement efforts. Example of sending the Office for Seniors information about Biometric Code Initiative for

• Staff have confidence in their community engagement efforts because they create interesting content and make defensible decisions.

their newsletter. This did lead to an increase in email contacts, however these were positively received because they highlighted public information gaps and sources of confusion.

Environmental Protection Authority (New Zealand)	
Resources	Effects
 Community Engagement Lead – 1 dedicated staff (formerly part of a team but consolidated under a Māori Engagement Group due to shifts in government priorities). Māori Engagement Group – provides advice and support to iwi and applicants during engagement processes and raises awareness with iwi on how to engage and participate in decision-making processes. Social media presence on Facebook, Instagram, LinkedIn, and Vimeo. 	 Videos posted to EPA website – this initiative showcases creative, outside-the-box thinking. Public data relating to community input about the environment (collected as community members received complimentary haircuts) was tracked for two years – encouraging constructive dialogue around environmental protection issues. Staff received formal training to handle complainants.
Results	Workload Changes
 Rapid dissemination of public information to enhance transparency/accountability. Prioritize easily understandable language and information being easily discoverable. Focus on plain language and following accessibility protocols. 	 Emphasis on proactive engagement to improve regulatory outcomes, fostering self-regulation, and reduced need for resource-heavy compliance/processes. Emphasis on not being afraid to abandon ineffective engagement initiatives.

Serious Fraud Office (New Zealand)	
Resources	Effects
 Communications and Engagement Staff (1 dedicated staff, 1 currently on leave but returning soon. Second staff member's contract to be extended by 6 months). Counter Fraud Centre – conducts counter- prevention work and raises awareness in prevention around financial crimes and fraud. Social media (primarily LinkedIn, given where the SFO's target audience is found). Posted content is specific to speaking engagements, meetings, and activities of the counter-fraud centre. Email newsletter (in progress). 	 Acceptance rate for complaints is 0.2-0.5% of all complaints received; many are referred to other agencies. Trainings administered to public and private sectors – seminars, webinars, one-on-one workshops. Media strategy – promotion of major case milestones. Sit-down interviews conducted only where something significant to say. Ombudsman engages in speaking engagement program with business and legal communities. Execute on training requests throughout the Pacific region.
Results	Workload Changes
 Some historical reluctance to focus outwardly, given risk-averse nature of the office. Speaking engagements generally provide a simple way to start to counteract that risk-averse culture, however media interviews are scheduled around substance and incorporate carefully crafted messages. 	 Small but noticeable connection between outreach efforts and complaints being filed, but due to the overall very small percentage of complaints being filed with the SFO, it is difficult to draw any specific connection between the two. Noticeable increase in social media followers and website engagement subsequent to media interviews being conducted.