


11 March 2025

LGOIMA 25-049

Tēnā koe 

Request for information on conflict of interest register

Thank you for your request of 3 March 2025, made under the Local Government Official Information and Meetings Act 1987 (LGOIMA – the Act) for the following:

Does Wellington Water maintain a conflict of interest (COI) register?

Does WWL maintain a gift register?

In the COI register have you recorded the property interests of staff who make procurement or panel membership decisions? Or a record of their spousal or familial interests? Or any secondary business interests?

Has WWL ever checked whether property improvements or personal purchases have been made that are beyond the purchasing power of staff based on their declared financial earnings?

Your request is responded to in accordance with the Act. Please refer to the appendix on the following page that responds to your individual questions.

Please note that it is our policy to publicly release our responses to official information requests where possible. Our response to your request will be published shortly at <https://www.wellingtonwater.co.nz/about-us/official-requests/official-information-act-responses/> with your personal information removed.

You have the right to seek an investigation and review by the Ombudsman of this decision. Information about how to make a complaint is available at www.ombudsman.parliament.nz or freephone 0800 802 602.

If you wish to discuss this decision with us, please feel free to email us at official.information@wellingtonwater.co.nz

Nāku noa, nā


Chief Corporate Services Officer
Corporate Services

APPENDIX

1. *Does Wellington Water maintain a conflict of interest (COI) register?*

Yes. Wellington Water maintains a conflict of interest register.

2. *Does WWL maintain a gift register?*

Yes. WWL maintains a gift register to record gifts received by staff.

3. *In the COI register have you recorded the property interests of staff who make procurement or panel membership decisions? Or a record of their spousal or familial interests? Or any secondary business interests?*

Our policy requires all staff to declare any actual, potential, or perceived conflicts of interest, including property interests, secondary business interests, and relevant spousal or familial interests. Any declared conflicts related to procurement or panel membership decisions are recorded in the conflict of interest register and managed in line with our management of conflicts processes.

4. *Has WWL ever checked whether property improvements or personal purchases have been made that are beyond the purchasing power of staff based on their declared financial earnings?*

As noted on the [Privacy Commissioners website](#); 'Agencies should only collect the personal information they need to carry out their functions and activities. This means that they can't collect information about you for the sake of it – the information has to be relevant to what they're doing.'¹ Wellington Water does not consider it appropriate to request this information from our staff, and therefore does not hold this type of information about its staff.

¹ <https://privacy.org.nz/tools/knowledge-base/view/330>