

Wellington Water

LGOIMA Improvement Plan - Response to Office of the Ombudsman Review

Recommendation	Update on action points	Progress rating
Action points: Leadership and culture		
1. The Chief Executive and senior leaders should make clear, visible, regular statements to staff about the importance of the LGOIMA and Wellington Water’s commitment to openness and transparency.	<p>Executive communications: The Chief Executive has addressed LGOIMA obligations and the value of transparency in all-staff forums, and senior leaders have committed to reinforcing these messages regularly through internal channels, including quarterly updates and performance conversations.</p> <p>Leadership Endorsement: A joint message from the ELT to be issued, highlighting the significance of timely and respectful engagement with official information requests as part of our public accountability.</p> <p>Policy communications: Further communication is planned to coincide with the launch of the refreshed LGOIMA Policy and guidance, ensuring staff at all levels understand both our legal obligations and our organisational values around public trust and transparency.</p>	In progress/ ongoing
2. Consider how the LGOIMA roadshow can become an ongoing LGOIMA training and awareness tool for staff.	<p>1. Embedding into Induction: Include a condensed LGOIMA module in all new staff inductions, covering key principles, roles, and expectations.</p> <p>2. Quarterly Refresher Sessions: Deliver live or recorded roadshow-style sessions every quarter, tailored to different business groups and incorporating real case examples.</p> <p>3. Team-Based Workshops: Offer targeted, interactive LGOIMA workshops on request, focused on teams with regular LGOIMA touchpoints (e.g., asset planning, service delivery).</p>	Not started
3. Review and update the LGOIMA request section of Wellington Water’s website, incorporating our suggestions.	<p>We will review and enhance the LGOIMA request section of Wellington Water’s website to improve clarity, usability, and alignment with best practice. This will include:</p> <p>1. Clearer Guidance: Revise content to explain what the LGOIMA is, what types of information can be requested, and how to make an effective request.</p> <p>2. Simple Submission Process: Streamline the request process with a user-friendly online form, including options to specify timeframes, topics, and preferred formats.</p> <p>3. Transparency Commitments: Add a statement outlining our commitment to openness, how we handle requests, and typical response timelines.</p> <p>4. Published Responses: Establish a “Proactive Releases” page to publish high-interest responses and documents, starting with the 2024/25 financial year.</p> <p>5. Accessibility & Tone: Ensure plain language, accessible formatting, and a welcoming tone to encourage public engagement.</p>	Not started

Recommendation	Update on action points	Progress rating
Actions points: Organisation structure, staffing and capability		
4. Consider how resilience arrangements can be built into the LGOIMA handling process.	<ul style="list-style-type: none">introduce standardised tools such as shared templates, workflows, and checklists to ensure consistency regardless of who is managing a request. implement a centralised tracking register (e.g., SharePoint or CRM) to log and monitor requests, deadlines, and responsibilities. This will be accessible to all authorised staff.implement a centralised tracking register (e.g., SharePoint or CRM) to log and monitor requests, deadlines, and responsibilities. This will be accessible to all authorised staff.establish clear escalation pathways to ELT sponsors or the Legal Team for complex or time-sensitive requests.	In progress/ongoing
5. Ensure comprehensive and on-going LGOIMA training is available for all staff at a level appropriate to their role.	We will provide role-appropriate LGOIMA training to existing staff, incorporate training into induction processes for new staff, and hold occasional refresher sessions.	In progress/ongoing
6. Ensure IM and record keeping training is delivered to all staff, including comprehensive training at induction with regular refresher training available.	The LGOIMA team will set clear expectations by providing role-appropriate training that covers both LGOIMA and information management. This includes a comprehensive induction module for all new staff, supported by access to on-demand resources and occasional refresher sessions, as mentioned in Action 5 above.	Not started

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Recommendation	Update on action points	Progress rating
Action points: Internal policies, procedures and resources		
7. Prioritise engaging with Archives NZ to discuss a strategy for improvements to IM systems and processes, with a particular emphasis on ensuring information within the scope of LGOIMA requests can be located.	Undertake a review and engage with Archives NZ to confirm our statutory obligations as a CCO under the Public Records Act and ensure staff are aware of their recordkeeping responsibilities in the context of LGOIMA.	Not started
8. Review and update the IM policy and IM guidance in accordance with our suggestions.	Develop Practical Guidance, as IM policy doesn't exist to be able to update. Might be more appropriate to have all relevant information on intranet.	Not started
9. Consider implementing document naming conventions and incorporating these into IM guidance.	Develop Practical Guidance, as IM policy doesn't exist to be able to update. Might be more appropriate to have all relevant information on intranet.	Not started
10. Once updated, accompany the release of the IM policy and IM guidance with messaging from senior leaders about the importance of good record keeping and how this links to LGOIMA compliance.	Develop Practical Guidance, as IM policy doesn't exist to be able to update. Might be more appropriate to have all relevant information on intranet.	Not started

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Recommendation	Update on action points	Progress rating
Action points: Internal policies, procedures and resources (cont.)		
11. Prioritise the development of a comprehensive proactive release policy, in consultation with shareholding Councils where relevant, incorporating our suggestions.	Policy has been drafted (Release and Management of Official Information Policy) includes proactive release. Going to the Board for review and endorsement.	In progress/ ongoing
12. Once finalised, publish the proactive release policy.	Going to Board for approval in August.	In progress/ ongoing
13. Continue to develop LGOIMA process map and LGOIMA guidance incorporating our suggestions.	Process document has been created, practical implementation is being refined.	In progress/ ongoing
14. Prioritise the development of LGOIMA policy incorporating our suggestions, and publish the policy once it is finalised.	Prioritise the development of a comprehensive proactive release policy, in consultation with shareholding Councils where relevant, incorporating our suggestions.	In progress/ ongoing

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Action points: Current practices		
15. Review practice around the involvement of COs in the LGOIMA handling process.	Discussed at ELT, approach yet to be formalised however escalations are occurring and seem to be working effectively.	In progress/ongoing
16. Ensure substantive discussions on LGOIMA decision making are captured in writing and saved to LGOIMA SharePoint files.	This requires improved IM practices however this will be supported by updated guidance, team reminders,	In progress/ongoing
17. Ensure that IT request forms are saved in LGOIMA files and that this is embedded in practice and guidance.	We will work with the IT team to ensure all IT request forms related to LGOIMA responses are saved in the relevant LGOIMA SharePoint files. This requirement will be embedded in updated guidance and reinforced through process changes and staff reminders to ensure consistent practice.	Not started
18. Where applicable, keep a summary of decision making processes on LGOIMA requests.	Where applicable, we will ensure a brief summary of LGOIMA decision-making is captured by saving the relevant email chain or final approval email into the LGOIMA SharePoint file. This aligns with current practice and avoids duplicating effort. Guidance will be updated to reflect this expectation and ensure consistent application across teams.	In progress/ongoing
19. Include the reasons, in plain English, for withholding information under section 7(2) of the LGOIMA in response letters to requesters.	A simple prompt will be added to the checklist to help reinforce this in future responses.	In progress/ongoing

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Recommendation	Update on action points	Progress rating
Action points: Current practices (cont.)		
20. Where information is withheld under s 7(2) of the LGOIMA, ensure the agency's genuine consideration of countervailing reasons in the public interest to release the information is expressed to the requester in the LGOIMA response.	We are already applying this in current responses by including reference to the public interest test when withholding under section 7(2). To support consistency, we'll add a prompt to the checklist to ensure this consideration is clearly expressed in all relevant responses.	In progress/ongoing
21. Ensure the agency's approach to withholding staff names from LGOIMA responses is clearly set out in LGOIMA training, policy and guidance.	The agency's approach to withholding staff names is already included in the LGOIMA policy going to the Board. This position will also be reflected in updated training and guidance materials to ensure consistent understanding and application across the organisation.	In progress/ongoing
22. Where relevant, ensure media requests for information are internally transferred to the LGOIMA team rather than the onus being on the requester to submit a new request.	This practice is already in place, with media requests for information internally transferred to the LGOIMA team where appropriate. To support consistency, we will formally document this process on the intranet guidance page so staff understand when and how to action internal transfers without requiring the requester to resubmit.	In progress/ongoing
23. Review and update the media enquiries summary table, incorporating our suggestions.	As part of this improvement, the media team will transition to the same tracking system used by the LGOIMA team, ensuring better alignment and visibility across both functions.	In progress/ongoing

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Recommendation	Update on action points	Progress rating
Action points: Performance monitoring and learning		
24. Establish LGOIMA performance targets which should include timeliness performance, and make this known to staff.	Draft LGOIMA performance targets focusing on timeliness have been established and are undergoing refinement. Once confirmed, these targets will be included in the LGOIMA process documentation and shared with staff through guidance materials and internal communications to support accountability and consistent performance.	In progress/ongoing
25. Publish LGOIMA performance data to demonstrate openness and drive accountability.	While not required for external reporting, LGOIMA performance data will be reported to ELT quarterly to support transparency and accountability. The first iteration will be included in the July quarterly report, with ongoing internal reporting helping to track progress and inform improvement efforts.	In progress/ongoing
26. Consider collecting more comprehensive data on LGOIMA request handling so that opportunities for performance improvement can be identified, and include this in reporting to senior leaders.	As the LGOIMA tracking system becomes more sophisticated, we will explore options to collect more comprehensive data on request handling such as response times by stage, complexity, and business unit involvement. While this would require additional resourcing, it could provide valuable insights for performance improvement and will be considered for inclusion in future reporting to senior leaders.	In progress/ongoing
27. Consider developing a quality assurance process for completed LGOIMA requests.	Given the organisation's current maturity and resourcing, implementing a formal quality assurance process for LGOIMA requests would be challenging. It would require additional capacity, clear ownership, and cultural readiness for peer review all of which may be difficult to sustain at this stage. A lighter-touch approach, such as informal peer checks or targeted reviews during training, may be more achievable in the short term.	Not started