Improvement Plan

LGOIMA compliance and practice
at Christchurch City Council

Christchurch
City Council

Leadership and culture

We recognise the aspects of leadership and culture which the Ombudsman identified are going well:

- Good external strategic messaging
- Enhancing methods of public engagement
- Helpful website information on making a LGOIMA request

We will continue to implement and enhance these.

We acknowledge the opportunities for improvement and intend to address these:

	Recommended Action	Lead	Action	When
A	That the Chief Executive review the practice of the Senior Leadership Team's involvement in controlling the flow of information to the public and elected members to ensure an approach is adopted that is consistent with the principles and purposes of the LGOIMA, in particular, openness and transparency	CE	The new Chief Executive (to start Q2 F20) has read the Chief Ombudsman's provisional opinion. She has indicated that she intends to address the issues raised: "responding in an open and honest way will be the start of delivering the cultural change in our organisation at all levels."	Started and ongoing.
		CE	New CE to speak about the Ombudsman report at the Annual Leaders Workshop in November. *Due to the final report being embargoed this did not happen, CE to send video message to all staff to coincide with release of report on 13 Nov 19.*	13 Nov 19
		Acting CE/ DOCE	Improvement Plan developed with agreed mitigating actions and milestones for implementation. Recommendations from the Review of Senior Leadership Team's practices will be added to the Plan.	Completed
		CE	Review of Senior Leadership practices	Q3 F20
1	Ensure the outcome of the review of Senior Leadership Team's practices is clearly understood by staff and any recommendations' are implemented	CE	Communication of agreed practices	Q3 F20
2	Any amendments made to documents/records are transparent, with clear lines of accountability, and a record of the amendment is made	DOCE	While the Council has the capability in its InfoCouncil and TRIM systems that capture and log changes, we will investigate whether this is fit for purpose and the look to make changes as required.	Initiated
3	Establish a clear process for staff speaking up and raising concerns without fear of reprisal and ensure outcomes are clearly communicated back to staff	Head of Risk and Audit	Council has a Protected Disclosures Act Policy that provides a mechanism to allow staff to speak up and raise concerns without fear of reprisal	Completed
		Head of Risk and Audit	Develop and implement plan to ensure staff are aware of the Protected Disclosures Act Policy and process. This is to be linked to the development of LGOIMA training and to be included as part of induction training.	Q2 F20
		CE/Acting CE	CE /Acting CE to regularly communicate the existence of this policy and where to find it	Initiated – ongoing

Leadership and culture cont'd

	Recommended Action	Lead	Action	When
4	Regular consistent positive messaging by the Chief Executive and Senior Leaders about the importance of the LGOIMA and openness and transparency more generally in Council wide communications	Acting CE/ CE	Acting CE to send message to all staff about the importance of the LGOIMA and openness and transparency more generally in Council wide communications.	Initiated – ongoing
		Acting CE	Acting CE to include performance goal and target regarding adhering to LGOIMA and Information Management in Senior Leaders/ELT personal development plans	Completed
		GMs	GMs/Senior Leaders to cascade performance and target goal into personal development plans of Senior Leaders/direct reports	Completed
		Acting CE	Acting CE to send message to all staff about the importance of the LGOIMA performance target	Completed
		Acting CE/ LGOIMA Team	Plan and provide briefing on LGOIMA and Ombudsman's finding for the new CE	Completed
		OCE	Arrange meeting for new CE with Office of Ombudsman Office	29 Nov 19
		CE / PIPs	Reference the Council's intentions around openness and transparency and availability of information in external documents	Ongoing
5	Senior Leaders to role model behaviours consistent with a commitment to openness and transparency	ELT	Confirm expectations that Senior Leaders role model behaviours consistent with a commitment to openness and transparency.	Initiated – ongoing
		CE/OCE	Workshop on LGOIMA at Senior Leaders quarterly meetings	By Q4 F20
		ELT/PIP	Include positive messaging on openness and transparency as part of regular all staff communications	Ongoing
6	Complete the review of the structure of the Office of the Chief Executive to ensure the lines of decision-making and accountability are clear between the Director of the Office of the Chief Executive, the Senior Information Advisor, and the Chief Advisor to the Chief Executive	CE	Review of the structure of the Office of the Chief Executive, including the clarification of the lines of decision-making and accountability between the Director of the Office of the Chief Executive, the Senior Information Advisor, and the Chief Advisor to the Chief Executive.	Completed
		DOCE	Clarify and communicate lines of decision-making and accountability for GMs	Initiated
7	Ensure delegations for decisions on LGOIMA requests are clear, up to date and understood by Senior Leaders and staff	Head of Legal	Change delegations register to delegate to the Director of the Office of Chief Executive the power of decision making under the LGOIMA relating to the provisions of Official Information.	Completed
		DOCE	Incorporate explanation of delegations and decision making in updated LGOIMA training.	Q2 F20
8	Assign a Senior Manager with specific strategic responsibility and executive accountability for official information practice.	Acting CE	Assign to the Director of the Office of the Chief Executive the specific strategic responsibility and executive accountability for official information practice.	Completed

Leadership and culture cont'd

	Recommended Action	Lead	Action	When
9	Senior Leaders to champion a system for staff to identify and communicate opportunities for improvements to LGOIMA policies and practice, and proactive release	DOCE	Develop a mechanism for staff to volunteer their suggestions for improvements to LGOIMA policies and practice and proactive release practices. This will be championed by ELT and senior leaders (Note that inviting all staff will help demonstrate that this is an organisational wide commitment).	Q2 F20
		GMs	Include LGOIMA to agendas of Heads regular meetings	Initiated. Ongoing
10	Senior Leaders to set clear expectations that staff receive appropriate training on LGOIMA policies and procedures and make this expectation visible by attending training themselves	ELT	ELT set the example to other staff by attending inaugural LGOIMA training for leaders session.	Q4 F20
		ELT	Performance goal added to personal development plans of ELT/Senior Leaders	Completed
		Head of PIP	Use internal Communications Team to publicise LGOIMA training	Q3 F20
11	Include reference to LGOIMA compliance in job descriptions	Head of HR	Add reference to LGOIMA compliance to position descriptions as position descriptions are reviewed and renewed.	Initiated – ongoing.
12	Consider how a proactive release policy, once developed, can be incorporated into the Council's external communications strategy to further increase engagement and public participation in decision making	DOCE	Set up an inter-group project team to develop a proactive release policy. *This project team will include DOCE, Official Information, Legal and Comms.*	Q2 F20
		DOCE	Develop a proactive release policy for approval by ELT	Q2 F20
		ELT	Champion the provision of information for proactive release in line with the policy	From Q3 F20

Organisation structure, staffing and capability

We recognise the aspects of our organisation structure, staffing and capability which the Ombudsman identified are going well:

- The 'mixed' model for LGOIMA and 'centralised' model for LIMs
- Resilience in the system has been demonstrated by yearly increases in LGOIMA requests, during which time good timeliness compliance was maintained

We will continue to implement and enhance these aspects.

We acknowledge the opportunities for improvement and intend to address these:

	Recommended Action	Lead	Action	When
1	Develop a LGOIMA training programme tailored to the needs of all staff, including for staff at induction, the Public Information and Participation (PIP) Team and Customer Services Teams	DOCE	Establish an inter-group LOGIMA training team to develop a LGOIMA training programme. *Group to include Official Information, Comms, Customer Services and Organisational Development.*	Q2 F20
		DOCE	Develop a LGOIMA training programme tailored to the needs of all staff, including for staff at induction, the Public Information and Participation (PIP) Team and Customer Services Teams, including staff at induction as well as regular training for delegated decision makers.	Q3 F20
		ELT	Approve the LGOIMA training programme.	Q3 F20
		Head of HR	Implement the LGOIMA training programme.	Ongoing from Q3 F20.
2	Develop and implement more detailed, regular training for delegated decision makers, including Senior Leaders and for staff in the LGOIMA Team	DOCE	Establish an inter-group LOGIMA training team to develop a LGOIMA training programme.	Q2 F20
		DOCE	Develop a more detailed training package for delegated decision makers, including Senior Leaders and for staff in the LGOIMA Team	Q2 F20
		ELT	Approve the LGOIMA training programme.	Q2 F20
		Head of HR	Implement the LGOIMA training programme.	Ongoing from Q3 F20.
3	Ensure appropriate staff have access to, and understand how to use, the LGOIMA tracking spreadsheet to ensure back up is available if necessary	DOCE	Develop a process map for the Council's LGOIMA processes in ProMapp	Initiated – Q2 F20
		DOCE	Integrate the two Senior Advisors to the Chief Executive into the LGOIMA process and spreadsheet in order to build capacity in the Official Information Team.	Complete

Internal policies, procedures and resources

We recognise the aspects of our internal policies, procedures and resources which the Ombudsman identified as going well:

- Comprehensive guidance and resources exist to assist LIM processing
- Sound guidance on LGOIMA requests for elected members
- Guidance for authors of 'public excluded' reports
- Comprehensive record keeping policy

We will continue to implement and enhance these aspects.

We acknowledge the opportunities for improvement and intend to address these:

	Recommended Action	Lead	Action	When
1	Consider undertaking a review of Information Management (IM) policies and guidance to ensure they are fit for purpose	CIO	Undertake a review of Information Management (IM) policies and guidance to ensure they are fit for purpose	Completed
2	Ensure IM guidance is regularly reviewed and updated	CIO	Undertake an annual review of IM guidance and update as required.	Initiated – Ongoing.
3	Ensure IM guidance and policy is visible and easily accessible for staff and, if guidance is stored in more than one IM system, ensure guidance is consistent across all platforms	CIO	Provide link to IM guidance and policy on organisational intranet	Q3 F20
		CE	Message regarding IM guidance and policy in CE all staff update	Q3 F20
4.	Leaders to champion sound record keeping practice	CE	Champion sound record keeping practice at annual leaders workshop on 5 November. *To be included in video message to staff on 13 Nov 19.*	13 Nov 19
		CE	Include periodic communication to staff from the CE on the importance of sound record keeping.	Ongoing.
		ELT/Senior Leaders	ELT and Senior Leadership Group to champion sound record keeping practice	Ongoing.
5.	Prioritise the development of a proactive release policy with accountability for its delivery assigned to a senior leader	DOCE	Set up an inter-group project team to develop a proactive release policy.	Q2 F20
		DOCE	Develop a proactive release policy for approval by ELT	Q2 F20
		ELT	Champion the provision of information for proactive release in line with the policy	From Q3 F20
6.	Review and update LGOIMA guidance incorporating my suggestions	DOCE	Set up an inter-group project team to review and update LGOIMA guidance incorporating the Ombudsman's suggestions	Q2 F20
		DOCE	Complete a review and update LGOIMA guidance incorporating the Ombudsman's suggestions.	Q2 F20
7.	Ensure LGOIMA guidance is regularly reviewed and updated	DOCE	Conduct an annual review of LGOIMA guidance to ensure LGOIMA practice is in accordance with best practice and update as required.	Ongoing.
8.	Consider amending template letters to include specific consideration of the public interest, where applicable	Senior Info Advisor	Amend template letters to include specific consideration of the public interest, where applicable.	Completed

Current practices

We recognise the aspects of our current practices which the Ombudsman identified as going well:

- LGOIMA requests: 98% responded to within the maximum statutory timeframe in the last financial year
- LIM reports: 100% meet the statutory timeframe
- Meetings: Council has demonstrated that public notices, agendas and minutes are all compliant with LGOIMA

We will continue to implement and enhance these aspects.

We also note that:

- Our Official Information Team received 616 LGOIMA requests.
- Our Media Team responded to 4,496 media enquiries.
- Our Business Solutions supplied 11,031 LIM reports within the statutory timeframe
- Our OCE Team responded to 1,305 requests from elected members
- Our Call Centre receives approximately 50,000 queries every month

We acknowledge the opportunities for improvement and intend to address these:

	Recommended Action	Lead	Action	When
1	Ensure that all public and media information requests, as well as property file requests, are handled in accordance with the provisions of the LGOIMA	DOCE	Establish an Official Information Co-ordination Group (OICG) which includes subject matter experts from OCE, Business Solutions (LIMS and Property Files), PIP and Document Management	Q2 F20
		OICG	Ensure that all public and media information requests, as well as property file requests, are handled in accordance with the provisions of the LGOIMA through the Official Information Co-ordination Group	Initiated – Ongoing
2	Provide regular training to all Council teams that handle requests for information in any capacity	DOCE	Set up an inter-group training team to develop a LGOIMA training programme.	Q2 F20
		DOCE	Develop a LGOIMA training programme(as identified above)	Q3 F20
		Head of HR	Implement the LGOIMA training programme.	Ongoing from Q3 F20.
3	Upgrade to a database (non-spreadsheet) system to track LGOIMA requests and decisions	DOCE	Establish an Official Information Co-ordination Group (OICG) (as identified above)	Q2 F20
		OICG	Investigate and agree on a cross organisation database system to capture official information requests to the council and decisions	Q3 F20
		OICG	Implement a cross organisation database system to capture official information requests to the council and decisions	Q3 F20

Current practices cont'd

	Recommended Action	Lead	Action	When
4	Record the reasoning behind LGOIMA decisions, including any consideration of the public interest and the results of any consultations with third parties	DOCE	Develop a coversheet to record the reasoning behind LGOIMA decisions, including any consideration of the public interest and the results of any consultations with third parties.	Completed
		DOCE	Implement the use of coversheet to record the reasoning behind LGOIMA decisions, including any consideration of the public interest and the results of any consultations with third parties	Ongoing
		DOCE	Ensure the process to record the reasoning behind LGOIMA decisions, including any consideration of the public interest and the results of any consultations with third parties is enshrined in the LGOIMA process and captured in ProMapp.	Q3 F20
		OICG	Transition to a cross organisation database system with the ability to record the reasoning behind LGOIMA decisions, including any consideration of the public interest and the results of any consultations with third parties.	Q3 F20
5	Record the administrative steps taken in respect of LGOIMA responses where relevant	DOCE	Develop a coversheet and check list to record the administrative steps taken in respect of LGOIMA responses where relevant	Completed
		DOCE	Implement the use of a coversheet and checklist to record the administrative steps taken in respect of LGOIMA responses where relevant.	Ongoing
		DOCE	Ensure the administrative steps taken in respect of LGOIMA responses where relevant is enshrined in the LGOIMA process and captured in ProMapp.	Q3 F20
		OICG	Transition to a cross organisation database system with the ability to record the administrative steps taken in respect of LGOIMA responses where relevant.	Q3 F20
6	Establish a formalised peer review process	DOCE	Establish an Official Information Co-ordination Group (OICG) (as identified above).	Q2 F20
		OICG	Develop a formalised peer review process and capture this process in ProMapp.	Q3 F20
7	Ensure records are kept of workshops and briefings	ELT	Identify those workshops and briefings that require formal records.	Ongoing from Q2 F20.
		Council Secretariat	Undertake minuting of identified workshops and briefings.	Ongoing from Q2 F20.
8	Provide training to staff who are processing elected member requests to ensure consistency of practice	DOCE	Set up an inter-group project team to develop a LGOIMA training programme.	Q2 F20
		DOCE	Develop a LGOIMA training programme for staff who are processing elected member requests to ensure consistency of practice.	Q3 F20
		ELT	Approve the LGOIMA training programme	Q3 F20
		Head of HR	Implement the LGOIMA training programme.	Ongoing from Q3 F20.

Current practices cont'd

	Recommended Action	Lead	Action	When
9	Ensure that requests from elected members are handled in accordance with LGOIMA	DOCE	Develop a process for the handling of elected member requests that is in accordance with LGOIMA and ensure this is captured in ProMapp	Completed.
		OCE	Ensure requests from elected members are handled using the Council process.	Initiated – Ongoing.
10	Review the practice of sending all LGOIMA requests to the Mayor's office and develop a protocol between the Council and elected members to clarify elected member involvement in LGOIMAs	DOCE	Establish an Official Information Co-ordination Group (as identified above).	Q2 F20
		OICG	Develop a protocol between the Council and elected members to clarify elected member involvement in LGOIMAs and ensure this is captured in ProMapp	Q3 F20
11	Ensure the Mayor's advisor is not a participant in the weekly meeting where LGOIMA requests are discussed	DOCE	Change weekly LGOIMA meeting to an emerging issues meeting, structured so the representative from the Mayor's Office is not present when LGOIMA requests are discussed.	Completed
		DOCE	Ensure the developed protocol between the Council and elected members to clarify elected member involvement in LGOIMAs is followed by staff at the emerging issues meeting	Q2 F20

Performance and monitoring

We recognise the aspects of our performance and monitoring which the Ombudsman identified as going well:

- Weekly meetings to discuss LGOIMA requests
- Basic analysis framework for LGOIMAs to be further developed
- Ombudsman guidance is shared with key staff

We will continue to implement and enhance these aspects.

We acknowledge the opportunities for improvement and intend to address these:

	Recommended Action	Lead	Action	When
1	Consider analysing LGOIMA request data and collecting more comprehensive data on the Council's handling of LGOIMA requests	DOCE	Establish an Official Information Co-ordination Group (as identified above).	Q2 F20
2	Consider providing the Senior Leadership Team with a monthly report on LGOIMA requests	DOCE	Provide ELT with a regular report on LGOIMA requests	Initiated – Ongoing
3	Consider ways to include requests handled by the PIP Team and Customer Services Team, as well as elected member requests and property file requests, in LGOIMA statistical reporting	DOCE	Establish an Official Information Co-ordination Group (as identified above).	Q2 F20
4	Consider developing a formal quality assurance process for LGOIMAs	OICG	Develop a formal quality assurance process for LGOIMAs and capture this process in ProMapp	Q3 F20
5	Consider how staff can quickly and easily access previous LGOIMA decisions	OICG	Identify how staff can better access previous LGOIMA decisions.	Q2 F20