

Christchurch City Council LGOIMA Compliance and Paractice Improvement Plan

Serial	Category	Recommended Action	Action	Responsibility	Timeframe	Commenced	Completed	Status	Notes
1(a)	Leadership and Culture	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	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."	CE	Enduring	10-Oct-19	N/A	Underway	
1(b)			New CE to speak about the Ombudsman report at the Annual Leaders Workshop in November.	CE	Nov-19	13-Nov-19	13-Nov-19	Completed	Due to the final report being embargoed this did not happen, CE sent video message to all staff which coincided with release of report on 13 Nov 19. This will be an ongoing message from the CE to Senior Leaders.
1 (c)			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.	A/CE	Sep-19	23-Aug-19	6-Sep-19	Completed	
1 (d)			Review of Senior Leadership practices	CE	Feb-20			Not started	To commence in January 2020.
2			Ensure the outcome of the review of Senior Leadership Team's practices is clearly understood by staff and any recommendations' are implemented	Communication of agreed practices	CE	Feb-20			Not started
3	Any amendments made to documents/records are transparent, with clear lines of accountability, and a record of the amendment is made	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.	DOCE	Sep-19	6-Sep-19	30-Sep-19	Completed	Clarified that TRIM and InfoCouncil is fully capable of tracking all changes to documents and reports including author and date.	
4 (a)	Establish a clear process for staff speaking up and raising concerns without fear of reprisal and ensure outcomes are clearly communicated back to staff	Council has a Protected Disclosures Act Policy that provides a mechanism to allow staff to speak up and raise concerns without fear of reprisal	Head of Risk & Audit	Sep-19	6-Sep-19	6-Sep-19	Completed		
4 (b)		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.	Head of Risk & Audit	Dec-19		20-Dec-19	Completed	A new shared-services induction session for any staff leader has been developed, piloted and refined, and with regular sessions already scheduled throughout 2020. Additional awareness sessions and messaging for all staff are also scheduled annually.	
4 (c)		CE /Acting CE to regularly communicate the existence of this policy and where to find it	CE	Enduring	6-Sep-19		Initiated	Ongoing on a regular basis	

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5 (a)		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 to send message to all staff about the importance of the LGOIMA and openness and transparency more generally in Council wide communications.	A/CE and CE	Enduring	6-Sep-19		Initiated	A/CE sent message to all staff CE sent video message to all staff on 13 Nov 19.	
5 (b)			Acting CE to include performance goal and target regarding adhering to LGOIMA and Information Management in Senior Leaders/ELT personal development plans	A/CE	Sep-19	6-Sep-19	30-Sep-19	Completed	Performance goal has been set for CE and cascaded to ELT and senior managers in FY19/20 PDP.	
5 (c)			GMs/Senior Leaders to cascade performance and target goal into personal development plans of Senior Leaders/direct reports	ELT	Sep-19	6-Sep-19	30-Sep-19	Completed	Performance goal has been set for CE and cascaded to ELT and senior managers in FY19/20 PDP.	
5 (d)			Acting CE to send message to all staff about the importance of the LGOIMA performance target	A/CE	Sep-19	6-Sep-19	30-Sep-19	Completed		
5 (e)			Plan and provide briefing on LGOIMA and Ombudsman's finding for the new CE	A/CE	Oct-19	6-Sep-19	10-Oct-19	Completed		
5 (f)			Arrange meeting for new CE with Office of Ombudsman Office	DOCE	Nov-19	10-Oct-19	29-Nov-19	Completed	CE met with the Ombudsman on 29 Nov 19.	
5 (g)			Reference the Council's intentions around openness and transparency and availability of information in external documents	Head of PIP and CE	Enduring	6-Sep-19		Initiated		
6 (a)			Senior Leaders to role model behaviours consistent with a commitment to openness and transparency	Confirm expectations that Senior Leaders role model behaviours consistent with a commitment to openness and transparency.	ELT	Enduring	6-Sep-19		Initiated	
6 (b)				Workshop on LGOIMA at Senior Leaders quarterly meetings	OD and OCE	Mar-20			Not started	Booked for session on 19 February 2020.
6 (c)	Include positive messaging on openness and transparency as part of regular all staff communications	Head of PIP		Enduring	6-Sep-19		Initiated	Ongoing on a regular basis		
7		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	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.	CE	Jun-19		23-Jun-19	Completed	Review completed by the previous CE with new appointments made by 23 Jun 19.	
8 (a)	Ensure delegations for decisions on LGOIMA requests are clear, up to date and understood by Senior Leaders and staff	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.	Head of Legal	Sep-19	6-Sep-19	30-Sep-19	Completed	Closed		
8 (b)		Incorporate explanation of delegations and decision making in updated LGOIMA training.	DOCE	Sep-19	6-Sep-19		Initiated	Covered in current training sessions - will expand in finalised training regime		
9		Assign a Senior Manager with specific strategic responsibility and executive accountability for official information practice.	Assign to the Director of the Office of the Chief Executive the specific strategic responsibility and executive accountability for official information practice.	A/CE	Sep-19	6-Sep-19	6-Sep-19	Completed	Completed	

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10 (a)		Senior Leaders to champion a system for staff to identify and communicate opportunities for improvements to LGOIMA policies and practice, and proactive release	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).	DOCE	Dec-19	26-Nov-19	8-Dec-19	Initiated	Two questions added to Working@Council survey and communicated by organisation wide e-mail from CE on 26 Nov 19.
10 (b)			Include LGOIMA to agendas of Heads regular meetings	ELT	Enduring	6-Sep-19		Initiated	Memo sent to Heads of Service to encourage practice and add to relevant training.
11 (a)		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 set the example to other staff by attending inaugural LGOIMA training for leaders session.	ELT	May-20			Not started	Likely to be before 30 Mar 20.
11 (b)			Performance goal added to personal development plans of ELT/Senior Leaders	ELT	Sep-19	6-Sep-19	30-Sep-19	Completed	
11 (c)			Use internal Communications Team to publicise LGOIMA training	Head of PIP	Feb-20			Not started	Once training regime set, this will be carried out on an ongoing basis
12		Include reference to LGOIMA compliance in job descriptions	Add reference to LGOIMA compliance to position descriptions as position descriptions are reviewed and renewed.	Head of HR	Enduring	6-Sep-19		Completed	Added to Position Descriptions 28 November 2019.
13 (a)		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	Set up an inter-group project team to develop a proactive release policy.	DOCE	Nov-19		1-Nov-19	Completed	This project team includes DOCE, Official Information, Legal and Comms.
13 (b)			Develop a proactive release policy for approval by ELT	DOCE	Dec-19		20-Jan-20	Initiated	List of subjects to be presented to ELT on 20 Jan 20
13 (c)			Champion the provision of information for proactive release in line with the policy	ELT	Enduring	20-Jan-20		Not started	Subject to ELT approval on 20 Jan 20.
14 (a)	Organisation Structure, Staffing and Capability	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	Establish an inter-group LOGIMA training team to develop a LGOIMA training programme.	DOCE	Nov-19		1-Nov-19	Completed	Group to include Official Information, Comms, Customer Services and Organisational Development.
14 (b)			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.	DOCE	Feb-20		1-Feb-20	Initiated	Developing blended training programme to cover all staff. Working with HR and Office of the Ombudsman. Concept to be presented to ELT on 20 Jan 20.
14 (c)			Approve the LGOIMA training programme.	ELT	Feb-20		3-Feb-20	Not started	
14 (d)			Implement the LGOIMA training programme.	Head of HR	Enduring	3-Feb-20		Not started	From Q3 F20
15 (a)		Develop and implement more detailed, regular training for delegated decision makers, including Senior Leaders and for staff in the LGOIMA Team	Develop a more detailed training package for delegated decision makers, including Senior Leaders and for staff in the LGOIMA Team	DOCE	Dec-19		20-Dec-19	Initiated	Developing blended training programme to cover all staff. Working with HR and Office of the Ombudsman. Concept to be presented to ELT on 20 Jan 20.
15 (b)			Approve the LGOIMA training programme.	ELT	Jan-20			Not started	Subject to ELT approval of concept on 20 Jan 20.
15 (c)			Implement the LGOIMA training programme.	Head of HR	Enduring			Not started	From Q3 F20

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16 (a)		Ensure appropriate staff have access to, and understand how to use, the LGOIMA tracking spreadsheet to ensure back up is available if necessary	Develop a process map for the Council's LGOIMA processes in ProMapp	DOCE	Nov-19	16-Sep-19	6-Nov-19	Completed	Task completed. ELT to be briefed 2 Dec 19. Changes made to process and will be presented to ELT on 20 Jan 20.
16 (b)			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.	DOCE	Nov-19	16-Sep-19	1-Nov-19	Completed	
17	Internal policies, procedures and resources	Consider undertaking a review of Information Management (IM) policies and guidance to ensure they are fit for purpose	Undertake a review of Information Management (IM) policies and guidance to ensure they are fit for purpose	CIO	Nov-19	16-Sep-19	1-Nov-19	Completed	
18		Ensure IM guidance is regularly reviewed and updated	Undertake an annual review of IM guidance and update as required.	CIO	Enduring	16-Sep-19		Initiated	To be conducted annually in Q1 - See below
19 (a)		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	Provide link to IM guidance and policy on organisational intranet	CIO	Dec-19		20-Dec-19	Completed	The IM guidance and policy is already available on the organisational Intranet (including e-learning) http://intranet.ccc.govt.nz/organisation/internal-policies
19 (b)		Message regarding IM guidance and policy in CE all staff update	CIO	Dec-19		30-Jan-20	Initiated	- e-learning modules are available on the intranet - By the 6th December changes will be made to have the policy more visible on the intranet frontpage. - addition to what has been recommended, the Information Management Team will complete the plan for the year ahead, to increase awareness and compliance to the PRA by January 30, 2020	
20 (a)		Leaders to champion sound record keeping practice	Champion sound record keeping practice at annual leaders workshop on 5 November	CE	Nov-19	13-Nov-19	13-Nov-19	Completed	Included in video message to staff on 13 Nov 19.
20 (b)			Include periodic communication to staff from the CE on the importance of sound record keeping.	Head of PIP	Enduring	13-Nov-19		Initiated	To be included quarterly
20 (c)			ELT and Senior Leadership Group to champion sound record keeping practice	ELT	Enduring	16-Sep-19		Initiated	Also addressed in training and expectations set by review of senior leadership practices.
21 (a)		Prioritise the development of a proactive release policy with accountability for its delivery assigned to a senior leader	Set up an inter-group project team to develop a proactive release policy.	DOCE	Nov-19	16-Sep-19	1-Nov-19	Initiated	
21 (b)			Develop a proactive release policy for approval by ELT	DOCE	Dec-19		20-Jan-20	Initiated	To be presented to ELT on 20 Jan 20
21 (c)			Champion the provision of information for proactive release in line with the policy	ELT	Enduring	20-Jan-20		Not started	Subject to ELT approval on 20 Jan 20.
22 (a)		Review and update LGOIMA guidance incorporating my suggestions	Set up an inter-group project team to review and update LGOIMA guidance incorporating the Ombudsman's suggestions	DOCE	Dec-19		1-Nov-19	Initiated	

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22 (b)			Complete a review and update LGOIMA guidance incorporating the Ombudsman's suggestions.	DOCE	Dec-19	16-Sep-19		Initiated	
23		Ensure LGOIMA guidance is regularly reviewed and updated	Conduct an annual review of LGOIMA guidance to ensure LGOIMA practice is in accordance with best practice and update as required.	DOCE	Enduring	16-Sep-19		Initiated	To be conducted annually in Q1
24		Consider amending template letters to include specific consideration of the public interest, where applicable	Amend template letters to include specific consideration of the public interest, where applicable.	DOCE	Sep-19	16-Sep-19	30-Sep-19	Completed	
25 (a)	Current Practices	Ensure that all public and media information requests, as well as property file requests, are handled in accordance with the provisions of the LGOIMA	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	DOCE	Nov-19		1-Nov-19	Initiated	
25 (b)			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	OICG	Enduring			Initiated	Already underway but will re-iterate as part of OICG
26 (a)		Provide regular training to all Council teams that handle requests for information in any capacity	Set up an inter-group training team to develop a LGOIMA training programme.	DOCE	Nov-19		1-Nov-19	Initiated	
26 (b)			Develop a LGOIMA training programme	DOCE	Feb-20			Initiated	
26 (c)			Implement the LGOIMA training programme.	Head of HR	Enduring			Not started	Mar-20
27 (a)		Upgrade to a database (non-spreadsheet) system to track LGOIMA requests and decisions	Establish an Official Information Co-ordination Group (OICG)	DOCE	Nov-19		1-Nov-19	Initiated	
27 (b)			Investigate and agree on a cross organisation database system to capture official information requests to the council and decisions	OICG	Mar-20		1-Mar-20	Initiated	Investigating alternative solutions to replace spreadsheet.
27 (c)			Implement a cross organisation database system to capture official information requests to the council and decisions		Mar-20		1-Mar-20	Initiated	Investigating alternative solutions to replace spreadsheet.
28 (a)		Record the reasoning behind LGOIMA decisions, including any consideration of the public interest and the results of any consultations with third parties	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.	DOCE	Oct-19	16-Sep-19	1-Oct-19	Completed	
28 (b)	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		DOCE	Enduring	16-Sep-19		Initiated	Completed coversheets will be saved to ensure a record of decision making is clear.	
28 (c)	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.		DOCE	Enduring	16-Sep-19		Initiated	Completed coversheets will be saved to ensure a record of decision making is clear.	

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28 (d)			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.	OICG	Mar-20	16-Sep-19		Initiated	As per serial 27(b) above
29 (a)		Record the administrative steps taken in respect of LGOIMA responses where relevant	Develop a coversheet and check list to record the administrative steps taken in respect of LGOIMA responses where relevant	DOCE	Nov-19	16-Sep-19	1-Nov-19	Completed	
29 (b)			Implement the use of a coversheet and checklist to record the administrative steps taken in respect of LGOIMA responses where relevant.	DOCE	Enduring	1-Nov-19		Initiated	
29 (c)			Ensure the administrative steps taken in respect of LGOIMA responses where relevant is enshrined in the LGOIMA process and captured in ProMapp.	DOCE	Dec-19	16-Sep-19		Initiated	
29 (d)			Transition to a cross organisation database system with the ability to record the administrative steps taken in respect of LGOIMA responses where relevant.	OICG	Mar-20			Not started	As per serial 27(b) above
30 (a)		Establish a formalised peer review process	Establish an Official Information Co-ordination Group (OICG)	DOCE	Nov-19		1-Nov-19	Initiated	As per serial 25(a) above.
30 (b)			Develop a formalised peer review process and capture this process in ProMapp.	OICG	Mar-20			Not started	
31 (a)		Ensure records are kept of workshops and briefings	Identify those workshops and briefings that require formal records.	ELT	Nov-19	11-Nov-19	11-Nov-19	Completed	Paper approved at ELT on 11 Nov 19
31 (b)			Undertake minuting of identified workshops and briefings.	Head Governance & Partnerships	Enduring	11-Nov-19		Initiated	
32 (a)		Provide training to staff who are processing elected member requests to ensure consistency of practice	Set up an inter-group project team to develop a LGOIMA training programme.	DOCE	Nov-19		1-Nov-19	Initiated	As per serial 14(a) above
32 (b)			Develop a LGOIMA training programme for staff who are processing elected member requests to ensure consistency of practice.	DOCE	Mar-20			Initiated	As per serial 14(b) above
32 (c)			Approve the LGOIMA training programme	ELT	Mar-20			Not started	
32 (d)			Implement the LGOIMA training programme.	Head of HR	Enduring			Not started	
33 (a)		Ensure that requests from elected members are handled in accordance with LGOIMA	Develop a process for the handling of elected member requests that is in accordance with LGOIMA and ensure this is captured in ProMapp	DOCE	Nov-19	16-Sep-19	1-Nov-19	Completed	

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33 (b)			Ensure requests from elected members are handled using the Council process.	DOCE	Enduring	16-Sep-19		Initiated	Currently through the OCE process. All are handled under the provisions of the LGOIMA.
34 (a)		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	Establish an Official Information Co-ordination Group (as identified above).	DOCE	Nov-19		1-Nov-19	Initiated	As per serial 25(a) above
34 (b)			Develop a protocol between the Council and elected members to clarify elected member involvement in LGOIMAs and ensure this is captured in ProMapp	OICG	Feb-20		1-Feb-20	Initiated	Will finalise and brief Elected Members on the protocol.
35 (a)		Ensure the Mayor's advisor is not a participant in the weekly meeting where LGOIMA requests are discussed	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.	DOCE	Sep-19	16-Sep-19	16-Sep-19	Completed	
35 (b)			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	DOCE	Dec-19		1-Feb-20	Delayed	Date of implementation to move to Q3 F20 to be consistent with serial 34 (b)
36	Performance and Monitoring	Consider analysing LGOIMA request data and collecting more comprehensive data on the Council's handling of LGOIMA requests	Establish an Official Information Co-ordination Group	DOCE	Nov-19		1-Nov-19	Initiated	Can currently but expected to be able to provide greater data once new systems are in place.
37		Consider providing the Senior Leadership Team with a monthly report on LGOIMA requests	Provide ELT with a regular report on LGOIMA requests	DOCE	Enduring	14-Oct-19		Initiated	Weekly reports now provided to ELT.
38		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	Establish an Official Information Co-ordination Group	DOCE	Nov-19		1-Nov-19	Initiated	As above
39		Consider developing a formal quality assurance process for LGOIMAs	Develop a formal quality assurance process for LGOIMAs and capture this process in ProMapp	OICG	Feb-20		1-Feb-20	Not started	
40		Consider how staff can quickly and easily access previous LGOIMA decisions	Identify how staff can better access previous LGOIMA decisions.	OICG	Dec-19		16-Dec-19	Initiated	Identifying ways of increasing release of previous decisions. Will integrate with greater resources on line for staff and publically.