



29 July 2024

Bruce

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Kia ora

**Your Official Information Act request, reference: GOV-034020**

Thank you for your email of 1 July 2024, asking for the following information under the Official Information Act 1982 (the Act):

*In response GOV-032950, ACC provided a copy of the document titled "Annual Practising Certificate Review Process Clinical Staff at ACC." The background section (page 1) states:*

*"This document sets out the Annual Practising Certificate (APC) compliance and annual review requirements for all ACC clinical staff in Clinical Services, Health Partnerships, and Specialist Cover Assessment (SCA), where there is a business need for them to maintain their currency in clinical practice.*

*Current APCs ensure that advisors provide credible quality clinical advice and/or can make robust clinical quality cover decisions.*

*Each professional body has a requirement for Clinicians to hold a current APC to continue in clinical practice. One prerequisite to maintaining an APC is the evidence of on-going continuing professional development (CPD).*

*While it is the employee's responsibility to ensure that they have a current APC, as the employer it is appropriate process for ACC to check annually to ensure that they still have a current APC."*

*In response GOV- 028256, ACC provided copies of two collective agreements that were valid from 1 July 2023 to 31 March 2024. These were titled "Psychology Advisors Collective Agreement" and titled "Medical Advisors Collective Agreement". I am not requesting those documents.*

*I request the following information from 2000 to present:*

- (1) the job title of employees who were required to maintain a current practicing certificate from a health authority; and*
- (2) the job title of employees who had the delegated authority to make clinical cover decisions.*

*The following requests are for information related to each of the job titles in (1) and (2) above, but not including SCAs, SCA Team Leaders, or their previous job titles. [See my earlier request for those details.]*

*I request:*

- (a) the dates that that job title was being used by ACC; and*
- (b) copies of the job descriptions for each of the job titles and the dates that job description was valid; and*
- (c) copies of the the collective agreements for each of the job titles and the dates that the collective agreement was in effect; and*
- (d) copies of the delegation framework documents for the job titles in and the dates the delegation was in effect.*

I refer to ACC's letter to you of 25 July 2024 asking you for information about yourself and the reasons for this official information request. To date, you have not provided the information sought.

Today is the last of the 20 working days in which ACC may respond to your official information request without a time extension. For the reasons set out below, ACC is declining your request.

ACC's reasons now to decline your request are that:

- ACC has recently received a large number of apparently closely related official information requests that also appear to be made by or on behalf of the same person. There have been at least 40 requests over the past two months.
- These information requests require considerable expense and effort for ACC to respond to. ACC estimates that it is currently allocating more than the equivalent of one full time employee to respond to each of these requests separately, despite the fact that they seem closely related. It would likely require even more expense and effort to produce all of the information sought in each of these requests.
- Unfortunately, your request seems to be one of these 40 related requests. Because you have not provided ACC information to confirm that your request was made acting only for yourself and your own reasons, ACC has decided that your request is probably one of these many related requests.
- The way that you, or people acting for you, appear to have asked for a wide range of information in many separate requests rather than include all questions in one request, interferes with ACC's ability to determine whether and how it might be able to apply various provisions of the Official Information Act to deal with your request. Those provisions relate to whether the requests taken as a whole require substantial collation or research so as to:
  - allow ACC to decline some or all of the requests under s18(f) of the Act;
  - consider combining your request with any other requests made by you under s18A(2) of the Act;
  - fully to consider fixing a charge for providing the documents concerned under s15 and s18A(1) of the Act.
- Because your request appears to be part of a wider course of conduct making numerous official information requests in a way that prevents ACC from applying the parts of the Official Information Act that protect agencies from being put to unreasonable effort and expense in responding to official information requests, ACC considers that your request is frivolous or vexatious in terms of s18(h) of the Act.
- Your entire request is therefore refused.

If ACC is wrong and your request is not one among many related requests then please let me know urgently, or if you prefer, take the issue to the Ombudsman via [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz) or by

phoning 0800 802 602. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

Ngā mihi



Christopher Johnston  
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Government Engagement