

29 July 2024

Bruce
fyi-request-27446-31a4d457@requests.fyi.org.nz

Kia ora

Your Official Information Act request, reference: GOV-033461

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

This is a request for a copy of ACC's corporate structure for each financial year from 2015 to present. In the event that the corporate structure changed during a particular financial year, such as with a change in CEO, please provide the updated structure and specify the dates in which the structure was operational.

To clarify, corporate structures are often shaped like a pyramid. The CEO is at top - being the sole person at level 1 management. Currently, that is Megan Main.

In most large organisations, the CEO will have 5-12 people who directly report to them. Those who directly report to the CEO are level 2 management, or part of the executive team. ACC's website states the current level 2 managers (executive team) are:

- Andy Milne, Deputy Chief Executive, Strategy, Engagement and Planning;*
- Amanda Malu, Deputy Chief Executive, Service Delivery;*
- Michael Frampton, Deputy Chief Executive, People and Culture;*
- Stewart McRobie, Deputy Chief Executive, Corporate and Finance;*
- Paul Dyer, Chief Investments Officer;*
- Campbell Mackie, Deputy Chief Executive, Enterprise Change Delivery;*
- Rēnata Blair, Deputy Chief Executive, Māori;*
- Phil Riley, Deputy Chief Executive, Prevention and Partnerships;*

Each of the Level 2 managers listed above (the executive team) will have direct reports. Those direct reports are level 3 management for specific groups within the overarching group. Those groups will likely be broken up into sub groups or teams, with each sub group or team having a manager (level 4 management). Sometimes, within the sub group or team there will be further differentiating teams, sub-teams, or non-management employees who have others who directly report to them - we will call them level 5 managers.

Thus, I am seeking the full corporate structure, that flows from each of the executive team members (level 2). For each executive team member, please provide each level of management below them (levels 3-??). For each level of management, please provide the name of the manager, the job title, the name of the team or group they manage, and the the names and job titles of all persons who report to that manager.

Again, I remind ACC's OIA team that the names of government employees cannot be withheld under section 9(2) of the OIA according to ACC's OIA policy and and the decisions of the Ombudsman.

I refer to ACC's letter to you of 5 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 with 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 in the way set out at the end of this message.

ACC sought the same information from each of the requestors in as many of the related requests as it has been able to identify, and has not received that information from any of them.

If you have any questions about this response, please get in touch

You can email me at GovernmentServices@acc.co.nz.

If you are not happy with this response, you can also contact the Ombudsman via info@ombudsman.parliament.nz or by phoning 0800 802 602. Information about how to make a complaint is available at www.ombudsman.parliament.nz.

Ngā mihi



Christopher Johnston
Manager Official Information Act Services
Government Engagement