

21 April 2026

LGOIMA 26-064

Simon Glenn

fyi-request-34195-93eaedc3@requests.fyi.org.nz

Tēnā koe Simon

Probity and social drinking with contractors

Thank you for your request of 22 March 2026, in which you sought information about how many Wellington Water staff have been invited to social drinks with contractors, and whether any such interactions have been disclosed in a register.

On 2 April 2026, you were contacted to seek clarification and refinement of your request. Your clarified request was received on 6 April 2026. The relevant correspondence is included in full at Appendix One.

In accordance with the Local Government Official Information and Meetings Act 1987 (LGOIMA – the Act), Wellington Water’s response is set out below.

Scope of the request

Your request has been considered in two parts:

- **Part A:** Whether social drinks with contractors have been disclosed in any Wellington Water register
- **Part B:** How many staff have been invited to social drinks with contractors (requiring an email and IT system search)

Part A: Disclosure in registers

We are pleased to provide the following information relating to your request:

The Wellington Water Gifts Register requires that:

- All offers of gifts or entertainment valued at \$50 or more must be recorded
- Gifts under \$50 are not required to be recorded, unless there is a concern (in which case staff are directed to consult their manager)
- All Christmas gifts, regardless of value, must be recorded and are managed centrally
- Gifts over \$100 should not be accepted, except in exceptional circumstances, and must be recorded regardless of whether they are accepted

A search of the Gifts Register confirms that there are no entries that record or disclose social drinks with contractors.

Additionally, Section 5.4 of the Wellington Water Limited Code of Conduct provides that staff must not accept gifts or benefits that could compromise, or be perceived to compromise, their integrity.

Part B: Number of staff invited to social drinks with contractors

For the second part of your request, following your clarification and suggested search terms (Project Manager, Contract Manager, and Procurement Manager), IT searches were undertaken for the relevant timeframes. The search parameters and results are provided at Appendix Two. Names have been withheld under section 7(2)(a) of the Act to protect the privacy of individuals.

These searches returned a total of 33,329 results. Reviewing, assessing, and extracting relevant information from this volume of material would require substantial collation and manual analysis.

As a result, this part of your request is refused under section 17(f) of the LGOIMA, as it would require substantial collation and research. Processing this volume of material would involve a disproportionate and unreasonable diversion of Wellington Water's staff resources.

The public interest in release has been considered and has been assessed. As noted above, Wellington Water Limited has rules in its Code of Conduct which prevent staff from accepting gifts or benefits that could compromise, or be perceived to compromise, their integrity.

Further as noted, any gift or benefit received over \$50 is required to be registered. All staff are required to adhere to Wellington Water Limited's Code of Conduct. Breach of the Code may give rise to disciplinary action.

You have the right to seek an investigation and review of this response by the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz or by calling 0800 802 602.

If you would like to discuss this response, please contact us at official.information@wellingtonwater.co.nz

Nāku noa, nā



Erin Ganley
Chief Risk and Compliance Officer