

20 June 2016

David Lawson
fyi-request-4031-325cb9a1@requests.fyi.org.nz

Dear Mr Lawson

Official Information Act Request

Thank you for your email received 20 May 2016 requesting information about the ACC "Issues Management Team".

Requests

I am writing to request pursuant to the Official Information Act 1982 the following information in response to the ACC's Issues Management Team (IMT).

Request One

It would be appreciated if you could confirm if the IMT is still referred to as the IMT, and if not please advise the new name of this unit.

Response to Request One

Yes it is still called the Issues Management Team. The "Issues Management Team" is not a unit of the ACC, but a daily group meeting with representation from different parts of ACC related to issues management.

Request Two

Please provide all official information that relates to the organisational structure of this unit, including details of the following;

- i) the number of full time staff the IMT employs and or contracts,*
- ii) the position descriptions and job roles of each staff,*
- iii) the lower and upper salary range of the staff employed within the unit, together with the average salary within the unit*
- iv) all information associated with the purpose and strategy behind the set up of this unit.*
- v) whether this unit encompasses ACC Legal, and if so the number of staff that are trained lawyers. If ACC's legal team does not form part of this unit are their trained lawyers overseeing the decisions that are being made within the unit.*

Response to Request Two

- I. The IMT has one full time member, but they are not employed by the IMT.
- II. The Issues Management Team (IMT) has only one full time member, the Corporate Issues Manager (CIM), whose primary role is to triage reported reputational risk issues, to oversee the management of those issues as required and to ensure appropriate stakeholders are informed of risks in a timely manner.

The role of the CIM in such situations is to offer an assessment of reputational risk to ACC in relation to any proposals or reports, with a particular emphasis on likely media and social media reaction, and provide suggestions on possible mitigations that could be usefully employed.

- III. As there is only one staff member this is being refused as there is a need to protect the privacy interests of the person concerned. In making that decision we have determined that the staff member's privacy interests outweigh the public interest in the availability of official information in this instance. This decision complies with section 9(2)(a) of the Act.
- IV. Refer to our response to question one.
- V. Refer to our response to question one.

Request Three

Please specify all other government ministries that are associated with ACC's Issues Management Team for example does the MBIE have access to and provide input to ACC's IMT, does the Ministry of Justice etc.

Response to Request Three

No other agencies are associated with the IMT.

Question Four

Please confirm whether as part of a risk management strategy, if the ACC's IMT has access via MBIE, Ministry of Justice, Ministry of Social Development, or direct access itself to risk intelligence gained through entities such as Palantir NZ, SIS and or the GCSB that would be targeted towards an ACC client and or claimant and or used in an attempt to mitigate risk in terms of ACC's reputational, or privacy risk matrix's in circumstances in which ACC has failed in their duty of care to their clients, and claimants.

Response to Request Four

The IMT does not have access to information gathered by other agencies.

Request Five

Please advise whether an entity or individual whom is managed by the IMT is allocated a unique identifier, and if so, please provide an example of the alpha numeric set up of the unique identifier and advise how many characters and or digits there are that make up such a unique identifier.

Response to Request Five

ACC can confirm that no unique identifiers are allocated.

Request Six

Please advise whether the information obtained in respect of the person and or entity that has progressed to the IMT, is shared outside of ACC, to any other ministries and or third party organisations and or entities. If so please specify the full list, together with the full information in terms of the information sharing agreements that are relied upon to facilitate such exchange.

Response to Request Six

Issues that are brought to the attention of the IMT are not shared outside of ACC.

Request Seven

Please advise since the IMT was initially set up in 2013, as to how many complaints have been managed by this unit and to what percentage of the issues managed have been found in favour of the ACC Client or claimant.

Response to Request Seven

Issues are distinct from risks and complaints. The IMT does not deal with complaints – that is the function of the Customer Feedback team. Further, the Corporate Issues Manager's role is to triage and escalate issues, and provide advice that could assist with their resolution.

Question Eight

I also note that the ACC's Privacy Unit and ACC's Government Services team are headed by the same individual and was wondering if you could confirm whether Mr Paul Holmes also has an active role within the ACC's Issues Management Team.

Response to Question Eight

Mr Paul Holmes does not play an active role in the IMT. As mentioned the IMT meets daily to discuss issues as they arise. Team Managers from Government Services and the Privacy Officer attend on an as required basis in order to keep the Government Services and Privacy Teams apprised of issues as they develop.

Question Nine

In relation to ACC's Privacy and ACC's Government Services Unit being headed by the same person, please confirm how the conflict of interest between championing the ACC client's or claimant's privacy rights to which you would expect an entity's Chief Privacy Officer aspiring to, be managed alongside ACC Government Services team being the first line of risk management defense in terms of strategy to manage/ mitigate ACC's exposure to their reputation in situations where the level of service that has been provided to a claimant/client falls well below the levels expected in the Act and or Code of Claimants' Rights?

Response to Question Nine

We have considered question nine and note that it suggests that there is a conflict in the Privacy and Government Services Teams being headed by the same manager. You appear to be seeking an opinion on this. Please note that the Official Information Act 1982 requires agencies, like ACC, to make decisions on releasing information it holds. It does not require agencies to provide opinions.

Questions or concerns about ACC's response

If you have further questions, contact us by email at GovernmentServices@acc.co.nz.

You have the right to make a complaint to the Office of the Ombudsman regarding our response. You can call them on 0800 802 602, 9am to 5pm weekdays, or write to: The Office of the Ombudsman, PO Box 10 152, Wellington 6143.

Yours sincerely

Government Services