

1

From:

Sent:

Tuesday, 6 October 2015 1:24 p.m.

To:

@msd.govt.nz; @ird.govt.nz; @customs.govt.nz;
 @nzdf.mil.nz; @doc.govt.nz;
 @crownlaw.govt.nz; @doc.govt.nz;
 @transport.govt.nz; @treasury.govt.nz;
 @ird.govt.nz; @mpi.govt.nz; @nzdf.mil.nz;
 @cyf.govt.nz; @dpmc.govt.nz; @moh.govt.nz;
 @minedu.govt.nz; @linz.govt.nz;
 @police.govt.nz; @linz.govt.nz;
 @minedu.govt.nz; @corrections.govt.nz;
 official.correspondence@nzta.govt.nz; @cera.govt.nz;
 @corrections.govt.nz; @mwa.govt.nz;
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Cc:

@dia.govt.nz);
 @dpmc.govt.nz; @ssc.govt.nz;
 @treasury.govt.nz;
 @ombudsman.parliament.nz);
 @ombudsman.parliament.nz; l

Subject:

December meeting of the Official Information Forum

Kia ora all

I hope everyone is well, and enjoying the new public sector guidance resources we developed! With the guidance finally circulating around the public sector, it's probably a good time for the Forum to get together and build on that work.

We're going to hold another **meeting of the Forum on the afternoon of 3 December**. At the meeting we will:

- discuss the guidance, how it is being promoted, and the role Forum members could play in promoting it further;
- hear the Office of the Ombudsman speak about the Chief Ombudsman's inquiry;
- use the Forum to kick off a review of MOJ's OIA charging guidelines (including a discussion with the Office of the Ombudsman on the statutory basis for charging); and
- identify opportunities to improve OIA coordination and cooperation across the public sector, and how to action them.

I'll be in touch with more details and an invite soon. In the meantime, if you have any questions, feel free to get in touch.

Ngā mihi nui



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From:

Sent:

Wednesday, 4 November 2015 9:24 a.m.

To:

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 df.mil.nz; doc.govt.nz;
 crownlaw.govt.nz; doc.govt.nz;
 transport.govt.nz; dia.govt.nz;
 ird.govt.nz; treasury.govt.nz;
 cyf.govt.nz; mpi.govt.nz; zdf.mil.nz;
 dpmc.govt.nz; moh.govt.nz;
 minedu.govt.nz; linz.govt.nz;
 police.govt.nz; linz.govt.nz;
 minedu.govt.nz; corrections.govt.nz;
 official.correspondence@nzta.govt.nz; corrections.govt.nz;
 mwa.govt.nz; minedu.govt.nz;
 police.govt.nz; mpia.govt.nz;
 tec.govt.nz; police.govt.nz;
 dia.govt.nz; police.govt.nz;
 dia.govt.nz; transport.govt.nz;
 moh.govt.nz; moh.govt.nz; y@mbie.govt.nz;
 cera.govt.nz; doc.govt.nz; er@corrections.govt.nz;
 dia.govt.nz; tec.govt.nz; mch.govt.nz;
 mch.govt.nz; parliament.govt.nz;
 mpia.govt.nz; tpk.govt.nz;
 dia.govt.nz; ministerial.requests@tec.govt.nz;
 corrections.govt.nz; tpk.govt.nz;
 minedu.govt.nz; r@corrections.govt.nz;
 ian@ird.govt.nz; mpia.govt.nz;
 mch.govt.nz; mpi.govt.nz;
 mbie.govt.nz; k.govt.nz

Cc:

treasury.govt.nz;
 ssc.govt.nz; dpmc.govt.nz;
 ombudsman.parliament.nz);
 ombudsman.parliament.nz

Subject:

3 December meeting of the Official Information Forum

Kia ora everyone

You will have just received an invite to the next meeting of the Official Information Forum. I hope you can make it.

The meeting will be from 1.00 - 3.30 pm on Thursday 3 December. The agenda for the day will look something like this:

- 1.00 - 1.10 Welcome/housekeeping
- 1.10 - 1.20 Plugging the new guidance resources and floating a role for the Forum in promoting them within your respective agencies
- 1.20 - 1.30 Office of the Ombudsman: discussion about the statutory basis for charging (lead-in to workshop)
- 1.30 - 2.00 Workshop: Reviewing MOJ's charging guidelines
- 2.00 - 2.20 Afternoon tea
- 2.20 - 2.45 Update from Office of the Ombudsman on Chief Ombudsman's inquiry, with time for questions
- 2.45 - 3.15 Workshop: *out of scope*

Reviewing MOJ Charging Guidelines

Reviewing MOJ's charging guidelines is another Cabinet-directed task. We are currently devising a workshop based on a critique of the existing guidelines, however, we would like to get the input of those who are familiar with operating under the guidelines or otherwise charging for requests. **If you would like to help us frame the review, and perhaps be involved in revising the guidelines after the workshop, please let me know - ideally by the end of this week.**

out of scope

I'll be in touch with more details, including a finalised agenda, in a couple of weeks. In the meantime, I look forward to hearing from those of you who would like to contribute to framing the workshops.

Nga mihi



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3

From:
Sent: Wednesday, 2 December 2015 4:22 p.m.
To: @ird.govt.nz'; @customs.govt.nz';
 @crownlaw.govt.nz', @dia.govt.nz';
 @ird.govt.nz'; @dpmc.govt.nz';
 @police.govt.nz'; @corrections.govt.nz';
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 @mbie.govt.nz'; @dia.govt.nz';
 @tec.govt.nz' @mch.govt.nz';
 @mpia.govt.nz @mch.govt.i @mpi.govt.nz';
 @mbie.govt.nz';

Cc: @ombudsman.parliament.nz
 @ombudsman.parliament.nz;
 @ombudsman.parliament.nz)

Subject: RE: 3 December meeting of the Official Information Forum
Attachments: 20151113 - OIA Forum - 3 Dec 2015 - workshop summaries.doc; charging-guidelines.pdf

Hi again

To give you more of an idea about what we're discussing tomorrow, please find attached summaries of the workshops. Also attached are the current charging guidelines for context, just in case you need a refresher!

See you soon!

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From:
Sent: Tuesday, 1 December 2015 2:18 p.m.
To:

Cc: _____@parliament.nz; _____@ombudsman.parliament.nz); _____@ombudsman.parliament.nz)

Subject: 3 December meeting of the Official Information Forum

Kia ora koutou

Thanks for making the time to come along to the 3 December meeting of the Official Information Forum on Thursday - it's looking like it's going to be a very productive session.

Here's the agenda:

Item	Time	Activity
0.	1.00 – 1.10	Welcome/housekeeping
1.	1.10 - 1.20	Discussion about new guidance resources
2.	1.20 - 1.30	Office of the Ombudsman: presentation about the statutory basis for charging
3.	1.30 - 2.10	Workshop: Reviewing MOJ's charging guidelines
4.	2.10 - 2.30	Afternoon tea
5.	2.30 - 2.50	Office of the Ombudsman: Update on Chief Ombudsman's inquiry
6.	2.50 - 3.30	Workshop: <i>Out of scope</i>

To get here, please come to MOJ using the 19 Aitken St. entrance, and take the lifts to reception on level three. You can ask for me at reception, but it is likely that I'll either be waiting for you or already ferrying people to the room we're in.

In the meantime, please let me know if you have any questions.

Nga mihi nui



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Workshop 1: Reviewing the OIA charging guidelines

Purpose

The purpose of this workshop is to help progress a revision of MOJ's OIA charging guidelines. There will be 2 discussions, about:

1. what in the existing guidelines should be kept, and what should be added; and
2. what in the existing guidelines should be revised.

Your role is to interrogate the assumptions and proposals, and record any thoughts that you think contribute either to their acceptance or rejection, including how any proposals might work.

There will be ten minutes for the first discussion, as what should be kept and what should be added shouldn't generate much debate. **There will be twenty minutes for the second discussion**, so participants can explore *how* certain parts of the existing guidelines should be revised. Some time is also set aside at the start so participants have the opportunity to share any relevant experiences or comments they may have.

Discussion 1: what in the existing guidelines should be kept, and what should be added

Kept

- a charge should not include extra time spent locating and retrieving information when it is not where it ought to be
- a charge may be modified or waived, if it might cause the applicant hardship, if it would facilitate good relations with the public, or if it would be in the public interest (and questions that, when answered, would help establish the level of public interest)
- that deposits or up-front payment can be requested and that costs include GST
- provisions in the OIA that assist with managing large requests
- information about Office of the Ombudsman involvement in reviewing decisions
- requests from the same source in respect of a common subject within intervals of 8 weeks may be aggregated

Added

- an explanation of the statutory basis for charging
- a discussion of how proactive release can reduce the number and size of requests an agency receives, and thus have an impact on the need to use charging guidelines in the first place

Discussion 2: what in the existing guidelines should be revised

- calculation of the amount to charge should be simplified
- while retaining rationale about why requests from the media and opposition political parties should not receive charges, the guidance should include advice about when it is reasonable to consider charging them
- the rate of charge per half hour should be updated according to the same rationale that it was originally calculated (i.e. based on annual salary of clerical/executive support staff, x 150% for overheads)

Workshop 1: Reviewing the OIA charging guidelines

Purpose

The purpose of this workshop is to help progress a revision of MOJ's OIA charging guidelines.

Facilitator's role

The facilitator's role is to introduce the workshop, participate in a group conversation, and ensure that all relevant insights and arguments are clearly recorded. You should also attempt to ascertain what level of agreement there is around key decision points.

How the workshop will run

There will be 2 discussions, about:

1. what in the existing guidelines should be kept, and what should be added; and
2. what in the existing guidelines should be revised.

There will be ten minutes for the first discussion, as what should be kept and what should be added shouldn't generate much debate. **There will be twenty minutes for the second discussion**, so participants can explore *how* certain parts of the existing guidelines should be revised. Some time is also set aside at the start so participants have the opportunity to share any relevant experiences or comments they may have.

For each discussion, you will divide the table you are facilitating in two. **You will spend half your time with one group, and the other half with the other group.** *There will be no report back or wider group discussion.* Therefore it is important you ensure both groups properly record their discussions.

Two separate worksheets, one for each discussion, are provided. Post-it notes are also provided so participants can record and affix any thoughts they have, whether or not they are recording the group's discussion.

A more detailed breakdown of the workshop, and explanation for participants, is provided over the page.

How the workshop fits with the rest of the meeting

This workshop is item 3 on the agenda. It carries on from item 2, which is a presentation from the Office of the Ombudsman about the statutory basis for charging. The presentation will also cover what the Office considers when investigating complaints about, or otherwise reviewing, decisions to charge. This should help to prime participants for a productive discussion. The full agenda for the meeting is:

Item	Time	Activity
0.	1.00 – 1.10	Welcome/housekeeping
1.	1.10 - 1.20	Discussion about new guidance resources
2.	1.20 - 1.30	Office of the Ombudsman: presentation about the statutory basis for charging
3.	1.30 - 2.10	Workshop: Reviewing MOJ's charging guidelines
4.	2.10 - 2.30	Afternoon tea
5.	2.30 - 2.50	Office of the Ombudsman: Update on Chief Ombudsman's inquiry
6.	2.50 - 3.30	Workshop: <i>Out of scope</i>

Preparation

Please read all the materials produced for this workshop, and the current charging guidelines.

Wrapping up

Thank the participants for their work. Let them know that a report recording what was contributed across all the groups will be provided to the Forum by January, for their feedback, and that the guidelines will be revised based on this report, in consultation with SSC, Treasury and the Office of the Ombudsman. Someone will come around and collect up all the papers.

Workshop run-sheet: reviewing the OJA charging guidelines

[Introductions will have been made at start of meeting.]

Introduce the workshop

1. Provide participants with the following materials:
 - *group worksheets 1 & 2: worksheets setting out the assumptions and proposals that are being discussed, context helpful for thinking about them, and space to agree, disagree and comment on why, if necessary.*
2. Quickly run through the two worksheets that have been provided to them, noting:
 - that the first part will discuss worksheet 1 – assumptions about what should be kept and what should be added – and:
 - will last for 10 minutes; and
 - that the worksheet provides definitive answers for review, i.e. that something *should* be kept or added to the guidance
 - that the second part will discuss worksheet 2 – proposals about what should be revised – and:
 - will last 20 minutes; and
 - that the worksheet is framed with questions of a more open nature, i.e. *whether or not* something should be change, and if so, how
 - that each specific assumption/proposal is listed with some context, and questions to prompt discussion or justify an assumption
 - that the table will split into 2 groups, with each group working on and filling out the provided worksheets
 - the objective of the group discussions is to agree or disagree and, if necessary, comment on why (or why they couldn't come to agreement).

Timing considerations to note with participants

- it is reasonable to expect that many of the assumptions in the first discussion will be able to be agreed quickly (they are included for thoroughness) – note that they shouldn't over-think things and should try to move through them quickly
- moving quickly through straightforward assumptions is necessary to ensure that the proposals receive enough time to properly discuss them. The following two proposals in the second discussion, in particular, will require more time than others:
 - that calculation of the amount to charge should be simplified;
 - that the guidelines should discuss when it is appropriate to consider charging media and opposition parties.

Begin the workshop

3. Ask the participants if anyone has any opening comments they'd like to make, or experiences they'd like to share. If nothing is forthcoming, just move on. If there are comments, ensure you move on to the next discussion at the right time.
4. Divide the table in two for the first discussion. Remind the two groups that they have 10 minutes to discuss the assumptions, **and that it is important that they record their discussion thoroughly.** Join one group for the first 5 minutes and the other for the second 5 minutes. *If necessary, take over recording the discussions.*
5. Keep track of time and ensure move on to the next discussion at the right time. To assist someone will come around and remind you when it is time to move on.
6. Repeat steps 4 and 5 for the discussion on the proposals, but noting that they have 20 minutes instead of 10.

Item	Activity	Time	Process
1.	<p>Introductions to workshop and opportunity for participants to make any initial comments (e.g. based on their experiences or the Office of the Ombudsman's presentation).</p>	1.30 – 1.40	<p>No great structure here. If participants have something they'd like to say up front, that's great. If not, don't worry about it and move on to the next item early.</p> <p>If participants do have something to say:</p> <ul style="list-style-type: none"> • make sure you record the key points (on a flipchart provided), and make sure you refer back to it when appropriate throughout the workshop • make sure the discussion doesn't become a general conversation that goes over time, as this is likely to be less helpful than the items it will take time from
2.	<p>Discussion 1: assumptions</p>	1.40 – 1.50	<p>Divide the table in 2 and provide them worksheet 1. Direct them to spend 10 minutes interrogating the assumptions. Nominate a note-taker and remind them of the importance of recording their thoughts. Note that there are post-its for anybody to record their thoughts, in case the note-taker is busy or misses their comments.</p> <p>Spend 5 minutes with one group, and 5 minutes with the second. If necessary, take over recording the discussions. Finish the discussion on time. Collect up the worksheets, ensuring all post-its are attached.</p>
3.	<p>Discussion 2: proposals</p>	1.50 – 2.10	<p>Provide the 2 groups worksheet 2. Direct them to spend 20 minutes interrogating the proposals.</p> <p>If necessary, remind them again of the importance of recording what they discuss.</p> <p>Spend 10 minutes with one group, and 10 minutes with the second. If necessary, take over recording the discussions. Someone will let you know when time is up. When it is, collect up the worksheets, ensuring all post-its are attached.</p>

Law Commission's recommended objectives of a revised charging framework

The Commission thinks that a revised charging framework should take account of the following objectives, that:

- the regime does not act as a disincentive to legitimate requesters and so is not an obstacle to freedom of information objectives;
- the regime acts as an incentive for requesters to tailor their requests so far as possible to reduce the administrative burden on agencies;
- the regime provides an incentive for agencies to maintain efficient information handling practices so that requests can be dealt with as promptly and cost-effectively as possible;
- the regime encourages (or does not discourage) best decision-making practices such as sufficient consultation;
- the regime provides an incentive for agencies to release information proactively as appropriate;
- the regime is not complex nor time-consuming for agencies to apply and does not add unduly to the administrative burden of agencies;
- the regime can be consistently applied by agencies so that it is not a cause of perceived unfairness amongst requesters.

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Reviewing the OIA charging guidelines - Group worksheet 1

What, in the existing guidelines, should be kept and what should be added?

Instructions:

- you have ten minutes
- agree or disagree with each assumption
- work quickly, most assumptions are straightforward
- record the **discussion** in the spaces provided, or use the post-it notes

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Assumptions – that the following parts of the existing guidelines that should be kept

Part to be kept: A charge should not include extra time spent locating and retrieving information when it is not where it ought to be

Context

Under the Public Records Act 2005 (section 17), agencies are required to create and maintain full and accurate records. These records must also be maintained in an accessible form to be used for subsequent reference (eg, to locate for the purposes of an OIA request).

Agree / disagree

Reasons and comments

[Empty box for reasons and comments]

Part to be kept: A charge may be modified or waived, if it might cause the applicant hardship, if it would facilitate good relations with the public, or if it would be in the public interest

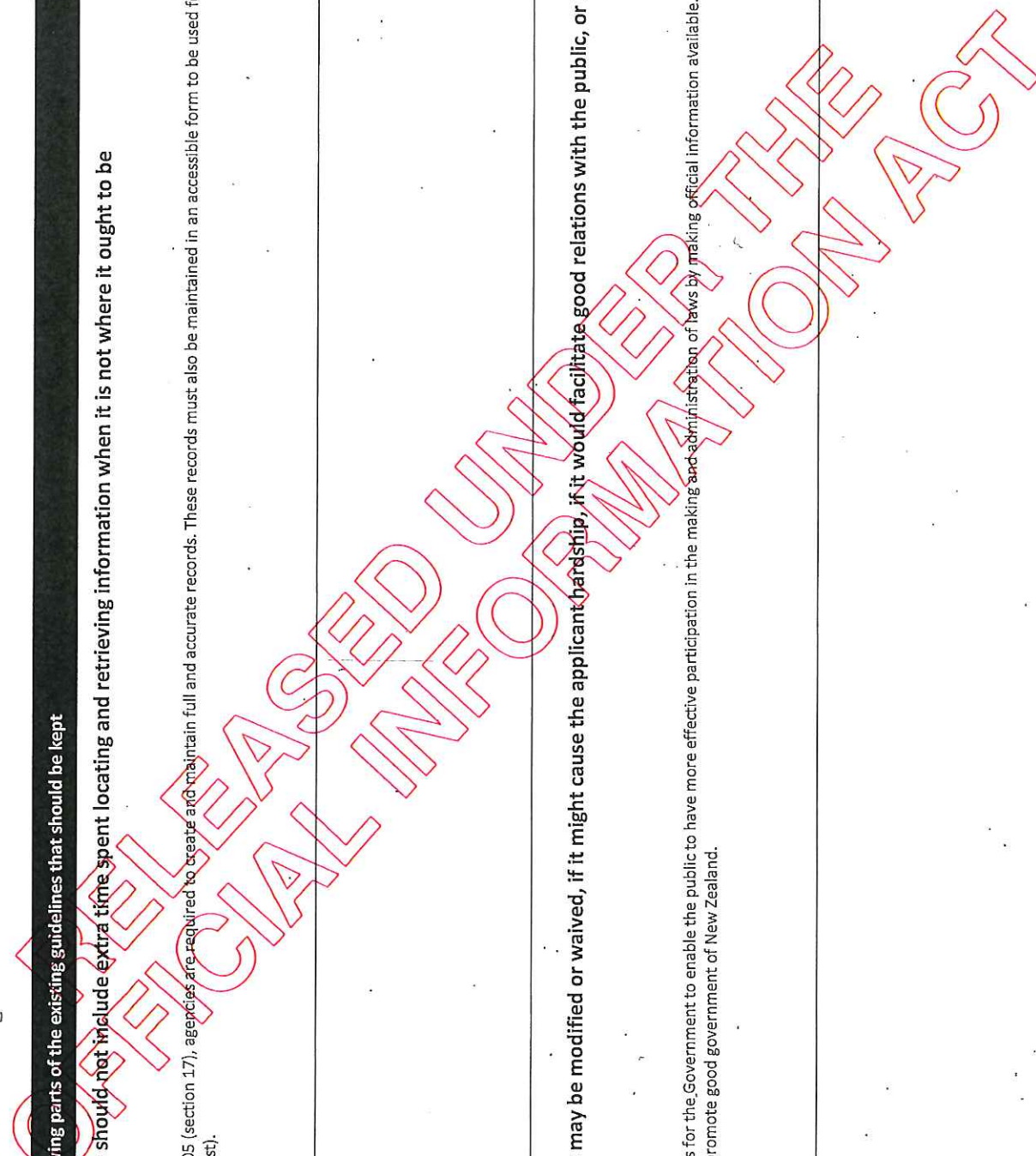
Context

One of the principles of the OIA is for the Government to enable the public to have more effective participation in the making and administration of laws by making official information available. In doing so, this will enhance the public's respect for the law and promote good government of New Zealand.

Agree / disagree

Reasons and comments

[Empty box for reasons and comments]



Assumptions – that the following parts of the existing guidelines that should be kept

Part to be kept: Advice about what constitutes the public interest

Context

Considerations for staff managing requests to establish the level of public interest in the current guidelines include whether the:

- requester's use of the information will make a significant contribution to operations and activities of government
- government has requested submissions from the public on a particular subject and is the information necessary to enable informed comment
- use of information is likely to contribute significantly to the understanding of the subject by the public at large, rather than the requester or a small group of interested people
- information already in the public domain in either the same or similar form, which could be acquired without substantial cost
- public at large will be the primary beneficiary of the expenditure of public funds necessary to release the information or is it for the requester or a small group of interested people
- information is primarily in the commercial interest of the requester rather than the public interest.

Questions

- Is there anything missing that that ought to be considered
- If a request, or part of a request, meets the public interest test, should the guidelines refer to the desirability of proactive release?
- Should discussion of public interest test be framed in such a way so as to ensure a charge isn't laid for information that is later, or should be made public?

Agree / disagree

Reasons and comments

Area for providing reasons and comments, overlaid with a large red watermark reading "RELEASED UNDER THE INFORMATION ACT".

Assumptions – that the following parts of the existing guidelines that should be kept

Part to be kept: That deposits or up-front payment can be requested and that costs include GST

Context

There is a statutory basis for requesting deposits or up-front payments. Under section 15(3) of the OIA, all or part of a charge may be required to be paid in advance.

Agree / disagree

Reasons and comments

[Empty box for reasons and comments]

Part to be kept: Reference to, or summary of, guidance about managing large requests

Context

Charging for a request is part of a process set out in the OIA for managing large requests before deciding to refuse a request. As such it seems appropriate to summarise this process in the charging guidelines.

Agree / disagree

Reasons and comments

[Empty box for reasons and comments]

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Assumptions – that the following parts of the existing guidelines that should be kept

Part to be kept: Information about Office of the Ombudsman involvement in reviewing decisions

Context

Under section 28(1)(b) of the OIA, the Ombudsman has the ability to investigate and review any decision relating to charging a requester.

Agree / disagree

Reasons and comments

Part to be kept: That requests from the same source in respect of a common subject within intervals of 8 weeks may be aggregated

Questions

- Do you see any issues with this for example, if individually the requests are manageable?
- Should aggregation instead be considered only while a previous request is still with the agency?
- Should the guidelines refer to recent changes to the OIA, which state that when a request is refined the clock starts again?

Agree / disagree

Reasons and comments

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Assumptions — that the following should be added to the revised guidelines

Part to be added: An explanation of the statutory basis for changing

Context

Feedback has indicated that a significant proportion of OIA practitioners consider that changing for official information goes against the principles of the OIA. The Office of the Ombudsman, however, considers charging to be an important tool for managing large requests. It is also a statutory tool that agencies have the option of using.

Questions

Was there anything in the Ombudsman's presentation that raised issues or questions, or required further explanation?

Agree / disagree

Reasons and comments

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Assumptions – that the following should be added to the revised guidelines

Part to be added: A discussion of how proactive release can reduce the number and size of requests an agency receives, and thus have an impact on the need to use charging guidelines in the first place

Context

Treasury practice of publicly releasing a significant proportion of responses prepared in response to OIA requests indicates that this has been a factor leading to a reduction in the number and size of OIA requests it receives.

Questions

If added, how closely should this guidance be connected to the part about the public interest test? For example, a recommendation that anything that passes the public interest should be released proactively?

Agree / disagree

Reasons and comments

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Reviewing the OIA charging guidelines - Group worksheet 2

What, in the existing guidelines, should be revised (and how)?

Instructions:

- you have twenty minutes
- discuss whether you agree with the proposals
- if you do, think about how they might be put in place
- record the discussion in the spaces provided, or use the post-it notes

Proposals — that the following changes should be made to the guidelines

Part to be changed: Calculation of the amount to charge should be simplified

Context

Agency feedback indicates that the cost of administering, especially estimating, a charge is prohibitive. The first Forum meeting indicated that a fixed cost rather than one based on cost-recovery would be easier to work with.

The current guidance states:

- that where total staff time exceeds one hour, there should be:
 - an initial \$38 charge for the first half hour (or part of half hour), and
 - \$38 for each additional half hour (or part of half hour).
- there should be a charge of 20c per page for all pages over 20 pages
 - providing documents on computer discs
 - retrieving documents from off-site archives
 - reproducing film, video or audio recordings
 - arranging for requester to listen/watch audio/video recording
 - providing documents larger than foolscap/folio size (ie, A3 size upwards).

Where it concerns time spent on a request:

- you can charge for:
 - searching an index to establish the location
 - physically locating and extracting the information
 - reading or reviewing the information (including the identification what may or may not be released)
 - supervising access to the information
 - the physical process of editing information before release
- but you cannot charge for:
 - extra time spent locating information when it is not where it ought to be
 - time spent assessing information to determine whether or not it can be released

As well as a time-based charging model (similar to what we have) the Law Commission discusses the following approaches:

Flat fee model, based on number of pages released:

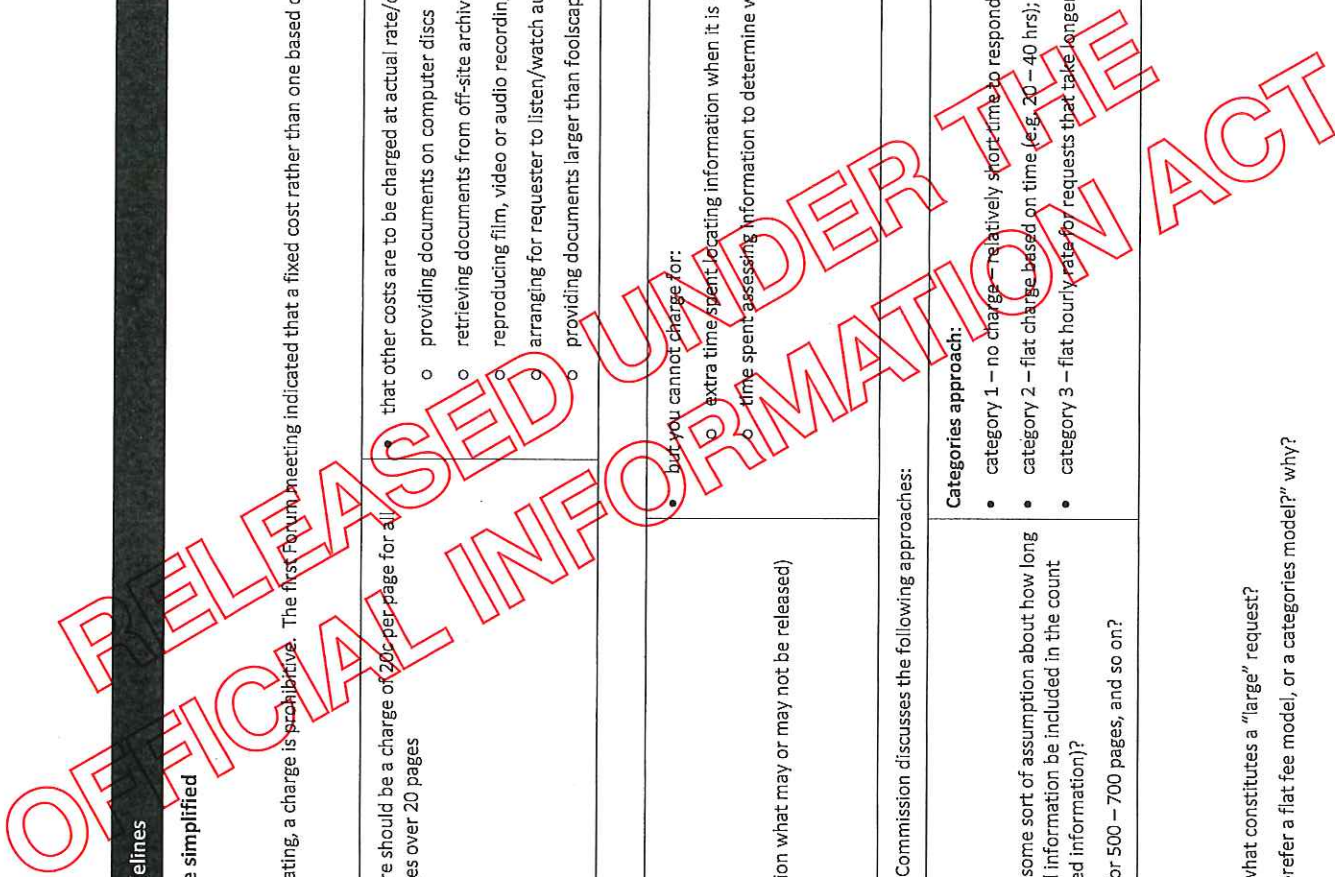
- where would the threshold to start charging be set (e.g. 100 pages)?
- how would you establish the cost? per page and multiplied? based on some sort of assumption about how long it takes, on average, to review 100 pages? should pages with redacted information be included in the count (based on the principle that there should not be a charge for unreleased information)?
- would you establish tiers, i.e. a flat fee for 300 – 500 pages, a flat fee for 500 – 700 pages, and so on?

Categories approach:

- category 1 – no charge – relatively short time to respond;
- category 2 – flat charge based on time (e.g. 20 – 40 hrs);
- category 3 – flat hourly rate for requests that take longer than category 2 requests

Questions

- Where should the threshold for consideration of a charge sit?
- In your experience, what constitutes an “average” sized request, and what constitutes a “large” request?
- Based on your understanding of difficulties with charging, would you prefer a flat fee model, or a categories model? why?



Proposals — that the following changes should be made to the guidelines

Calculation of the amount to charge should be simplified: Agree / disagree / how?

Reasons and comments, especially ideas about how the calculation should be simplified.

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Proposals – that the following changes should be made to the guidelines

Part to be changed: While retaining rationale about why requests from the media and opposition political parties should not receive charges, the guidance should include advice about when it is reasonable to consider charging them

Context

Currently, the guidance notes the relationship between the media, and MPs and their research units, and the public interest. In particular, that:

- as media have access to means of public dissemination, this would usually demonstrate that there is wider public benefit in obtaining information; and
- it is appropriate to consider the opposition's democratic function when responding to requests from MPs and research units.

The Law Commission's 1997 Review of the OIA noted important reasons for not charging MPs or their research units:

- the Opposition's limited resources
- constitutional importance of the OIA (and the parliamentary question procedure) as a means of keeping the Executive accountable to the legislature.

The Law Commission's 2012 report stated that:

- "there is no reason why unreasonable political requests should be completely exempt. Voluminous and unrefined requests from parliamentary research units can cause a great deal of expenditure of resources. The charging mechanism should be available to agencies as a defence mechanism in appropriate cases, regardless of the source of the request"; and
- "there is sometimes debate about the role of the media and whether media requests are always clearly in the public interest, given the commercial imperatives under which the media operate."

Questions

What are the sorts of considerations practitioners should be aware of when assessing media and opposition requests for potential charges? For example, does what they're requesting meet the public interest test?

Agree / disagree

Reasons and comments, especially on when it would be reasonable to charge media and opposition parties

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Proposals – that the following changes should be made to the guidelines

Part to be changed: The rate of charge per half hour should be updated according to the same rationale that it was originally calculated

Context

The original rate of charge was based on the formula:

Average Annual Salary x 2.5 to account for 150% for overheads.

The formula was originally based on the annual salary in 1989 of a public servant at a specified level in the clerical/executive class and was subsequently revised in 1992 and 2002 to account for increases in base salaries.

Agree / disagree

Reasons and comments

[Empty rectangular box for providing reasons and comments]

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