

## February Report: Progress on Ombudsman Investigation Action Items

### Purpose

This report provides an update on progress for February 2025 on implementing the 31 action items recommended by the Chief Ombudsman to improve OIA practice.

### Ratings

- Red = Not commenced
- Yellow = Commenced
- Orange = Partially implemented
- Green = Fully implemented

### Progress

Month	Not commenced	Commenced	Partially implemented	Fully implemented
November	24	6	0	1
December	7	15	3	6
January	3	8	6	14
February	1	8	5	17

### Progress tracker

Action	Update	Previous month	Current month
<b>Theme 1: Leadership and culture</b>			
1. The Chief Executive and senior leaders should regularly seek opportunities to promote the OIA.	<p><i>Pharmac's progress:</i></p> <p><i>SLT members have informally spoken to teams about the importance of OIAs.</i></p> <p><i>Tentative agreement from Rebecca Kitteridge, Deputy Public Service Commissioner to attend a staff meeting to discuss the importance of the OIA.</i></p> <p><i>Work underway to develop a 12 month awareness campaign</i></p>	Not commenced	Commenced

Action	Update	Previous month	Current month
2. Prioritise the development of a high level OIA strategy or plan, with associated responsibilities and accountabilities at the Senior Leadership team level, and promote it to all staff.	<p><i>Pharmac's progress:</i></p> <p><i>Discussions held on adding a section about our OIA strategy into the public affairs strategy.</i></p> <p><i>This will be occur in March 2025 when the draft strategy is reviewed.</i></p>	Commenced	Commenced
3. The Chief Executive and senior leaders should actively role model openness and transparency, and attend OIA training.	<p><i>Pharmac's progress:</i></p> <p><i>The Office of the Ombudsman has agreed to provide training to SLT on 6 March 2025.</i></p>	Commenced	Commenced
4. Chief Executive to consider ways to improve staff attitudes to the OIA, including increasing OIA training for all staff.	<p><i>Pharmac's progress:</i></p> <p><i>The Treasury have provided information on how they have embedded a positive OIA culture.</i></p> <p><i>The OIA training provided as part of induction will be rolled out to all staff. Consideration is required on how we record staff completion of this module.</i></p>	Commenced	Commenced
5. Ensure reporting about the handling of OIA requests is actioned in a timely manner to identify and prevent future backlogs.	<p><i>Pharmac's progress:</i></p> <p><i>Government Services has recommended reporting to SLT on current OIA's including highlighting which OIA's are due that week.</i></p> <p><i>Biannual reporting to the FAR Board Sub-Committee our OIA statistics that are reported to the Public Service Commission.</i></p> <p><i>No further action required.</i></p>	Partially implemented	Fully implemented

Action	Update	Previous month	Current month
6. Collect, analyse, and report to senior leaders more data on the handling of OIA requests, including information about time spent on OIA processing, in line with my suggestions.	<i>Pharmac's progress:</i> <i>Planned to commence in 2025.</i>	Not commenced	Not commenced
7. Include information on refusals under section 18(d) in OIA guidance material.	<i>Pharmac's progress:</i> <i>OIA guidance for Government Services has been updated.</i> <i>No further action required.</i>	Fully implemented	Fully implemented
8. Continue developing the Proactive Release Policy, and consider publishing it on Pharmac's website.	<i>Pharmac's progress:</i> <i>SLT discussed Pharmac's approach to proactive release on 20 January.</i> <i>The draft proactive release policy and implementation plan is scheduled to be discussed by SLT on 24 March 2025.</i>	Commenced	Commenced
<b>Theme 2: Organisation structure, resourcing and training</b>			
9. Implement long-term resilience measures to ensure Pharmac can meet OIA timeliness obligations in the event of increased OIA workload pressure.	<i>Pharmac's progress:</i> <i>A section in the Government Services OIA guidance document now details resilience measures.</i> <i>During workload spikes where possible OIAs will remain the responsibility of Government Services with other core business work distributed to the wider team.</i> <i>No further action required.</i>	Not commenced	Fully implemented
10. Update the Induction Pack as per my suggestions.	<i>Pharmac's progress:</i> <i>The induction pack material has been updated and is now provided to all new starters.</i> <i>No further action required.</i>	Fully implemented	Fully implemented

Action	Update	Previous month	Current month
11. Provide targeted OIA training to the Communications team and senior leaders on a regular basis.	<p><i>Pharmac's progress:</i></p> <p><i>All members of the Communications team have completed the Civic Square Module on the OIA.</i></p> <p><i>Staff from the Office of the Ombudsman delivered a training session on 27 November 2024 to all members of the Communications and Government Services teams.</i></p> <p><i>A 12-month refresher module will be required in late 2025.</i></p> <p><i>See action item 3 for training to senior leaders.</i></p>	Partially implemented	Partially implemented
12. Update the OIA intranet page as per my suggestions.	<p><i>Pharmac's progress:</i></p> <p><i>The intranet page was updated on 24 October 2024 to include the recommended wording.</i></p> <p><i>No further action is required.</i></p>	Fully implemented	Fully implemented
13. Continue to prioritise and resource the development of OIA guidance materials, and consider publishing them.	<p><i>Pharmac's progress:</i></p> <p><i>OIA guidance is currently being drafted by Government Services.</i></p> <p><i>The government services desk file has been completed.</i></p> <p><i>Guidance for staff and suppliers is currently being drafted.</i></p>	Partially implemented	Partially implemented
14. Update the Media Policy as per my suggestions.	<p><i>Pharmac's progress:</i></p> <p><i>The Media Policy has been undated and published in January 2025.</i></p> <p><i>No further action required.</i></p>	Fully implemented	Fully implemented

Theme 3: OIA handling by the Communications team			
15. Ensure resilience measures exist to allow Pharmac to continue to meet Public Records Act obligations in the event of staff absence or unexpected circumstances.	<p><i>Pharmac's progress:</i></p> <p><i>Scoping discussions are underway.</i></p>	Commenced	Commenced
Theme 4: Information management and record keeping			
16. Amend OIA record keeping practices to ensure full and accurate records of substantive correspondence (including telephone conversations, meetings and verbal discussions) with requesters, and records of any material internal discussions, are created and maintained.	<p><i>Pharmac's progress:</i></p> <p><i>The OIA decision memo has been updated to prompt the capturing of this information and there are clear expectations on recording this information.</i></p> <p><i>No further action required.</i></p>	Fully implemented	Fully implemented
17. Update the Records and Information Management Policy and OIA decision making memo as per my suggestions.	<p><i>Pharmac's progress:</i></p> <p><i>The OIA decision memo has been updated as requested and has been fully implemented.</i></p> <p><i>Amending the Records and Information Management Policy has not yet commenced.</i></p>	Partially implemented	Partially implemented
18. Assess staff training needs and provide regular refresher training to all staff on information management and record keeping.	<p><i>Pharmac's progress:</i></p> <p><i>Scoping discussions are underway.</i></p>	Commenced	Commenced

<p>19. Update OIA acknowledgement templates as per my suggestions and ensure all OIA requests are acknowledged within two working days of receipt.</p>	<p><i>Pharmac's progress:</i></p> <p><i>Government Services has updated its templates and now records if a request is acknowledged within 2 working days.</i></p> <p><i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>
<p><b>Theme 5: OIA team practice</b></p>			
<p>20. Continue to focus on improving the process for triaging OIA requests and keep a record of the outcome.</p>	<p><i>Pharmac's progress:</i></p> <p><i>Government Services has amended its decision memo template to include a triage section to record outcome of triage. Guidance on triaging is captured in the government services desk file.</i></p> <p><i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>
<p>21. Make sure information on handling urgent requests is included in OIA guidance, incorporating my suggestions, and circulated to subject matter experts.</p>	<p><i>Pharmac's progress:</i></p> <p><i>OIA guidance has been drafted by Government Services on how to manage urgent requests.</i></p> <p><i>The staff guidance on OIA's will contain an urgent request section.</i></p>	<p>Partially implemented</p>	<p>Partially implemented</p>
<p>22. Ensure there is clear messaging on Pharmac's <i>Making an OIA request</i> webpage for information requesters, advising them of their right to request urgency.</p>	<p><i>Pharmac's progress:</i></p> <p><i>The government services desk file has been completed to include an urgency section.</i></p> <p><i>Requests for urgency are clearly recorded in our decision memo.</i></p> <p><i>The 'How to make an OIA' webpage has been updated to include information on making an urgent request.</i></p> <p><i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>

<p>23. Consider ways to increase suppliers' exposure to, and awareness of, the OIA.</p>	<p><i>Pharmac's progress:</i> <i>The new supplier booklet has been updated to advise suppliers of their OIA obligations.</i> <i>Further OIA guidance for suppliers is currently being drafted by Government Services.</i></p>	<p>Partially implemented</p>	<p>Partially implemented</p>
<p>24. Consider adding information on consulting with third parties in OIA guidance.</p>	<p><i>Pharmac's progress:</i> <i>The government services desk file has been completed to include a consultation section.</i> <i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>
<p>25. Clarify who is responsible for making a decision on extensions and update guidance accordingly.</p>	<p><i>Pharmac's progress:</i> <i>The government services desk file has been completed to include an extension section.</i> <i>Process has been amended for Team Leader, Government Services to approve all OIA extensions, this is consistent with the Pharmac Delegations Policy.</i> <i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>
<p>26. Consider reporting the number of extensions, reasons for extensions, and the working day the extension was made to the Senior Leadership team.</p>	<p><i>Pharmac's progress:</i> <i>Government Services sought clarification with Office of the Ombudsman on this recommendation.</i> <i>Data about the extensions will be reported in the weekly government services update to SLT, so that any patterns can be identified and improvements made if there is an issue.</i> <i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>

<p>27. Keep an adequate record of the rationale for seeking an extension.</p>	<p><i>Pharmac's progress:</i> <i>Extensions are now required to be approved by the Team Leader, Government Services. The rationale for seeking an extension must be provided and saved in relevant Objective folder.</i> <i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>
<p>28. Finalise the Delegated Authority Policy for operational delegations and share it with all staff.</p>	<p><i>Pharmac's progress:</i> <i>This policy has been finalised and published.</i> <i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>
<p>29. Make sure OIA process mapping includes peer review and sign-out.</p>	<p><i>Pharmac's progress:</i> <i>The OIA process map has been completed and will be published on the intranet on the Official Information Act resource page.</i></p>	<p>Commenced</p>	<p>Fully implemented</p>
<p><b>Theme 6: Ministerial interactions</b></p>			
<p>30. Develop a written agreement with Ministers' offices on handling agency OIA requests, and consider publishing it on the OIA webpage.</p>	<p><i>Pharmac's progress:</i> <i>A draft agreement based on the Office of the Ombudsman template has been drafted and is in review.</i></p>	<p>Commenced</p>	<p>Commenced</p>
<p>31. Make sure OIA guidance material includes information on the notification of, and consultation with, Ministers' offices on agency OIA requests.</p>	<p><i>Pharmac's progress:</i> <i>The government services desk file has been completed to include a consultation section.</i> <i>No further action required.</i></p>	<p>Fully implemented</p>	<p>Fully implemented</p>