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# LAW·COMMISSION

## TE·AKA·MATUA·O·TE·TURE

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24 July 2012

Hon Sir Grant Hammond KNZM  
President  
Law Commission

### **Invitation to Media Conference at Law Commission Wednesday 25 July 2012 11am**

The Law Commission's report, *The Public's Right to Know: Review of the Official Information* (NZLC R125, 2012), is expected to be tabled in the House of Representatives on Wednesday afternoon 25 July 2012.

You are invited to a media conference at the Law Commission's office on Wednesday, 25 July at 11am. Sir Grant Hammond, President of the Law Commission, and Professor John Burrows, the Lead Commissioner on this project, will present the main findings of the report and answer questions about it.

Please find attached a summary of the key recommendations and five media releases relating to different aspects of the report. **These are all embargoed until the report is presented to Parliament**, which we expect to be by 2pm on Wednesday 25 July.

The Law Commission is situated on the 19<sup>th</sup> floor of 171 Featherston Street, Wellington. Please contact Lisa McCormick, Management Support Adviser, on 04 914 4817 with any further queries about the release of the report or the media conference.

Brigid Corcoran  
General Manager  
Law Commission



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**MEDIA RELEASE**

25 July 2012

Hon Sir Grant Hammond KNZM  
President  
Law Commission

**OFFICIAL INFORMATION ACTS:  
THE PUBLIC'S RIGHT TO KNOW**

The Law Commission today released its final report, *The Public's Right to Know: Review of the Official Information Legislation* (NZLC R125, 2012).

“Access to official information is vitally important for individuals and society,” says Professor John Burrows, the Lead Commissioner for this project. “Our review has evaluated how the Acts are faring 30 years on. In passing these Acts, New Zealand was an international leader in establishing a regime of openness in central and local government. Many other countries have tried to emulate our success and have overtaken us in some areas.”

The Law Commission has found that a number of significant commercial, economic, legislative and societal changes mean that key aspects of the Acts need to be reformed. The government has also made it clear that open and transparent government, including greater access to useful information, is one of the results it expects under the Better Public Services agenda.

“The law needs to keep pace with the changing context in which the Acts now operate. We need to tread the line between meeting growing citizen expectations for access to information, while recognising the limits on agency resources available to service the legislation. Our challenge has been to identify ways in which the Acts can be improved, without putting unrealistic burdens on agencies. We think there are real opportunities to both enhance the official information regime and to find efficiencies.”

Overall, the Commission's report reinforces that the main principles of the Act remain sound. The presumption in favour of openness has successfully changed the secretive culture of government that used to prevail under the Official Secrets Act. The Commission strongly endorses the role played by the Ombudsmen in investigating complaints against public agencies that do not to release information when requested.

The Commission recommends the Acts could be improved in a number of targeted areas such as:

- revamping the Ombudsmen’s guidance about release and withholding, using decided cases as examples to provide more clarity
- redrafting unclear and confusing withholding grounds – in particular the so-called “good government” grounds
- new withholding grounds to better protect commercially sensitive information, and information provided in the course of a statutory investigation or inquiry
- giving advance notice to people and organisations whose private, confidential or commercial information is liable to be released
- adjusting the grounds for refusing requests which impose too great a workload on agencies
- encouraging proactive release of public information
- new statutory oversight functions to support the legislative framework
- increasing the reach of the legislation by including additional bodies within its scope, either fully or partially, such as specified information about the courts and certain parliamentary bodies

“These changes would make the Act more effective in meeting requests for official information in the current climate of limited public sector resources,” Professor Burrows says.

“We have no doubt that the changes we recommend are needed for New Zealand to keep pace with the rest of the world and have a system that will be fit for purpose in a fast-moving environment. Opportunities for review and reform do not arise frequently, perhaps once in a generation. We believe the reform package we have come up with, a mix of targeted changes to the legislation and user-friendly guidance for both public bodies and requesters, will improve the OIA and LGOIMA and ensure they are in the best possible shape to perform their vital role into the 21<sup>st</sup> century.”

The report follows the Law Commission’s survey of users of the Acts in 2009-2010, and an Issues Paper in 2010. The Government will now consider the recommendations in the Law Commission’s report, and will respond to them in due course.

The report is available on the Commission’s website [www.lawcom.govt.nz](http://www.lawcom.govt.nz).

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**For further information and comment, contact: Professor John Burrows, Law Commission, tel (04) 914 4813 or 021 557 124, [jburrows@lawcom.govt.nz](mailto:jburrows@lawcom.govt.nz)**

This media release and a pdf of the report will be available from our website at <http://www.lawcom.govt.nz/project/review-official-information-act-1982-and-local-government-offical-information-act-1987>

For further information on the recommendations of the report see:

- The Public’s Right to Know: OIA requests and proactive release (media release)
- The Public’s Right to Know: Oversight of the official information legislation (media release)
- The Public’s Right to Know: Improvements to the OIA for requesters (media release)
- The Public’s Right to Know: Improvements to the OIA for public sector agencies (media release)
- “Key Recommendations” (background document)



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**MEDIA RELEASE**

25 July 2012

Hon Sir Grant Hammond KNZM  
President  
Law Commission

**THE PUBLIC'S RIGHT TO KNOW: OFFICIAL INFORMATION  
ACT REQUESTS AND PROACTIVE RELEASE**

The Law Commission today released its final report, *The Public's Right to Know: Review of the Official Information Legislation* (NZLC R125, 2012).

One of the Commission's tasks has been to see if changes should be made in light of the information technology revolution since the Act was first passed. New Zealand was a leader in encouraging more openness in government when the OIA became law. However, the environment in which the OIA now operates has fundamentally changed. Government now collects and creates vastly more information in many formats.

According to Professor John Burrows, the Lead Commissioner for this project, "We need to ensure that the OIA model is up to the job of meeting the challenges and expectations of the 21<sup>st</sup> century. Citizens should not always have to make OIA requests. Public bodies should be doing more to routinely release useful information."

The government has already recognised that public agencies hold a lot of useful information that should be made available to the general public. It has directed government departments and encouraged other Crown agencies to release high value public data (other than personal data) for re-use. The government has also made it clear that open and transparent government, including greater access to useful information, is one of the results it expects under the Better Public Services agenda.

Professor Burrows believes there is a real opportunity to reflect that expectation in the official information legislation so that public agencies have the appropriate tools to release information proactively, the public knows what to expect, and progress can be monitored.

The Commission is recommending a new statutory duty on public agencies to take reasonably practicable steps to proactively make official information publicly available. Professor Burrows stresses that the objective has been to avoid placing an unrealistic burden on agencies to immediately release large amounts of information.

“The advantage of this option is its flexibility,” he says. “This new duty would advance the fundamental purpose of the OIA to increase progressively the availability of official information to the people of New Zealand, but does not in any way dictate to agencies how they need to do that. Agencies can come up with their own strategy about how and when they will release information. They can set their priorities for release in line with the public interest and demand. They can take into account their budget constraints, and other workload. But a new statutory duty is consistent with the government’s directive and we think that in the long-run, this approach will save public money and agency time spent on meeting one-off OIA requests.”

The Law Commission believes there needs to be a clear framework covering both official information requests and proactive release to address confusion about what bearing the legislation has on agency decisions to proactively release official information. The Commission is recommending new legislative provisions that would cover the process of proactively releasing official information to the public.

The Government will now consider the recommendations in the Law Commission’s report, and will respond to them in due course.

The report is available on the Commission’s website [www.lawcom.govt.nz](http://www.lawcom.govt.nz).

-ENDS-

**For further information and comment, contact: Professor John Burrows, Law Commission, tel (04) 914 4813 or 021 557 124, [jburrows@lawcom.govt.nz](mailto:jburrows@lawcom.govt.nz)**

This media release and a pdf of the report will be available from our website at <http://www.lawcom.govt.nz/project/review-official-information-act-1982-and-local-government-offical-information-act-1987>



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**MEDIA RELEASE**

25 July 2012

Hon Sir Grant Hammond KNZM  
President  
Law Commission

**THE PUBLIC'S RIGHT TO KNOW: OVERSIGHT OF  
THE OFFICIAL INFORMATION LEGISLATION**

The Law Commission today released its final report, *The Public's Right to Know: Review of the Official Information Legislation* (NZLC R125, 2012).

According to Professor John Burrows, the Lead Commissioner for this project, "It is clear to us that these Acts lack an 'owner' within the public service charged with championing their purpose. This is holding the legislation back from meeting its important objectives."

The Office of the Ombudsmen has the role of dealing with complaints about information not being released when requested. Submissions to the Law Commission overwhelmingly supported the Ombudsmen continuing to do this. The Ombudsmen have also done what they can to support the legislation in other necessary ways, such as through guidelines, articles, seminars and training, although there is no clear mandate or funding for these activities.

"The lack of statutory oversight functions, other than complaints, is one of the largest gaps in our official information legislation. Since the OIA and LGOIMA were passed, other comparable statutes give clear functions to oversight bodies such as the Privacy Commissioner, the Chief Archivist and the Health and Disability Commissioner. Other countries, such as Australia and the United Kingdom, have set up oversight models such as an Information Commissioner."

The Commission regards the official information legislation as being of such public and constitutional importance that this omission needs to be addressed. Without statutory oversight of matters such as policy development, operational support and performance review, the Commission believes that perennial problems under the legislation will continue and may even get worse.

"There is a clear case for statutory oversight so that the legislation operates smoothly in what is becoming a complex environment. We believe there is a real need to establish a high level leadership role for official information within the government information management structure to deal with problems and take advantage of opportunities as they present themselves."

**UNDER EMBARGO UNTIL 25 JULY 2012 2:00PM**

The Law Commission suggests a range of options, including an Information Commissioner or co-locating the oversight functions with other information responsibilities, such as the Chief Government Information Officer in the Department of Internal Affairs.

The Commission is recommending that the Ombudsmen would continue to carry out the complaints and guidance functions.

The Government will now consider the recommendations in the Law Commission's report, and will respond to them in due course.

The report is available on the Commission's website [www.lawcom.govt.nz](http://www.lawcom.govt.nz).

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**For further information and comment, contact: Professor John Burrows, Law Commission, tel (04) 914 4813 or 021 557 124, [jburrows@lawcom.govt.nz](mailto:jburrows@lawcom.govt.nz)**

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# LAW COMMISSION

## TE AKA MATUA O TE TURE

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### MEDIA RELEASE

25 July 2012

Hon Sir Grant Hammond KNZM  
President  
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## THE PUBLIC'S RIGHT TO KNOW: IMPROVEMENTS TO THE OIA FOR REQUESTERS

The Law Commission has recommended a number of changes to the OIA to improve the process for requesters. Today the Commission released its final report, *The Public's Right to Know: Review of the Official Information Legislation* (NZLC R125, 2012).

The Official Information Act 1982 and the Local Government Official Information and Meetings Act 1987 are the two Acts that make up the framework for the public to access information held by central and local government. They are used on a regular basis by citizens, commercial organisations, non-governmental organisations, the media, and political parties for a wide range of purposes.

The Law Commission confirms that the basic structure of the Acts remains sound, but some targeted reforms will help to improve the operation of the legislation for requesters. These include:

- Guidance for requesters about how to make requests
- Clarifying the treatment of urgent requests
- Strengthening the obligation on agencies to consult with and assist requesters
- A principled review of which agencies should be subject to the legislation that would retain SOEs and CCOs and include additional bodies, either fully or partially, and specified information about the courts and certain parliamentary bodies
- Extending the grounds on which complaints about agency performance can be made to the Ombudsmen, such as lack of timeliness and decisions about transferring requests
- Streamlining the Ombudsmen's different complaint processes under the OIA and LGOIMA which are currently confusing

The Law Commission also believes that further work is needed to overhaul the charging framework that applies charges to some requests but not others. A number of other recommended changes to the Acts would have benefits for requesters. For example, reforms to difficult withholding grounds, and the publication of more guidance and case-notes for agencies, should help give requesters a clearer idea about what they can expect to be released.

**UNDER EMBARGO UNTIL 25 JULY 2012 2:00PM**

The recommendation that the Acts be re-drafted would also make the legislation more accessible to the public.

The Commission does not recommend much expansion of the grounds on which official information can be withheld from requesters, although it does recommend two new grounds:

- One to protect competitive position or financial interests
- One to protect information provided to a statutory investigation or inquiry

The Commission believes these new grounds are warranted to resolve the debate about whether such interests are covered by the existing withholding grounds. Both would be subject to the “public interest test” that requires agencies to weigh up whether the public interest favours release, even where these grounds arise. The Commission expresses concern about the lack of consistency in applying the public interest test and recommends redrafting so that it is not so easily overlooked.

The Commission also recommends some changes to help agencies deal with the workload produced by requests but has been careful to adopt a balanced approach so that this is not at the expense of access to information.

The Government will now consider the recommendations in the Law Commission’s report, and will respond to them in due course.

The report is available on the Commission’s website [www.lawcom.govt.nz](http://www.lawcom.govt.nz).

-ENDS-

**For further information and comment, contact: Professor John Burrows, Law Commission, tel (04) 914 4813 or 021 557 124, [jburrows@lawcom.govt.nz](mailto:jburrows@lawcom.govt.nz)**

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### **MEDIA RELEASE**

25 July 2012

Hon Sir Grant Hammond KNZM  
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## **THE PUBLIC'S RIGHT TO KNOW: IMPROVEMENTS TO THE OIA FOR PUBLIC SECTOR AGENCIES**

The Law Commission has recommended a number of changes to the OIA to improve the process for public agencies responding to requests for information. Today the Commission released its final report, *The Public's Right to Know: Review of the Official Information Legislation* (NZLC R125, 2012).

The Official Information Act 1982 and the Local Government Official Information and Meetings Act 1987 together make up the framework for the public to access information held by central and local government.

In its findings, the Law Commission reports the basic structure of the Acts to be sound, but thinks that some targeted reforms are needed to provide firmer foundations for agency decision-making about withholding and release. These include:

- Publication of more of the Ombudsmen's case-notes, and more user-friendly guidance on the legislation using case-notes to illustrate how to make decisions about release and withholding and to promote best practice decision-making
- More consistent guidance for departments dealing with politically sensitive requests and consulting with their Minister
- Redrafting the difficult "good government" withholding grounds that are currently unclear and confusing to apply
- A new withholding ground for protecting information supplied in the course of a statutory investigation or inquiry
- Giving advance notice to people or organisations whose information is liable to be released if there are privacy, commercial or confidentiality grounds for withholding it
- Creating clearer lines for refusing vexatious requests, requests that fail to provide enough detail to be processed efficiently, and requests that unreasonably divert agency resources to answer
- Aligning the legislation with government policy about the proactive release of information to establish a clearer framework

**UNDER EMBARGO UNTIL 25 JULY 2012 2:00PM**

- New statutory oversight functions to promote best practice and to address commonly occurring problems

The Law Commission also believes that further work is needed to overhaul the charging framework that applies charges to some requests but not others.

The Commission is recommending keeping the 20 working day time limit in which agencies must answer requests and retaining the current case by case approach so that each request is considered on its facts in light of any relevant public interest factors (rather than laying down more prescriptive rules about what should or should not be released).

The Government will now consider the recommendations in the Law Commission's report, and will respond to them in due course.

The report is available on the Commission's website [www.lawcom.govt.nz](http://www.lawcom.govt.nz).

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**For further information and comment, contact: Professor John Burrows, Law Commission, tel (04) 914 4813 or 021 557 124, [jburrows@lawcom.govt.nz](mailto:jburrows@lawcom.govt.nz)**

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25 July 2012

## Key Recommendations

The Law Commission report *The Public's Right to Know: Review of the Official Information Legislation* (NZLC R125, 2012) contains over 100 recommendations for reform. The report covers both the Official Information Act 1982 and Parts 1-6 of the Local Government Official Information and Meetings Act 1987. These two statutes make up the framework for the public to access information held by central and local government.

On the whole, the Commission has concluded that the basic pillars of the legislation remain fundamentally sound. But the context in which the legislation operates has changed significantly since the Acts became law:

- The Acts were passed before the information technology revolution; that major development has helped to drive social and cultural change and produce an even stronger expectation of openness and availability of information than in the past, and at the same time complicating the task for government agencies in facilitating public access to sizeable stores of government information.
- The last two decades have seen extensive growth in commercially oriented public organisations, raising questions about whether the official information legislation is appropriately calibrated for these entities.
- Other legislation passed and policy made since the official information legislation was enacted can sometimes cut across similar ground and raise issues about how the different requirements should be reconciled.
- The global financial crisis has placed the spotlight on the best and most efficient use of public resources.
- Governments, both in New Zealand and overseas, have taken the opportunity to open up government information for anyone who can put it to good use, as per last year's *Cabinet Declaration on Open and Transparent Government*.
- Earlier this year, the Government set its agenda for improved public services, identifying that more information must be made available to citizens.

The Commission has evaluated all of these factors in putting together a set of recommendations aimed at improving the operation of the legislation. The Commission has strived to put together a balanced package of measures, combining more guidance for people using the Acts (both requesters and public agencies administering requests) as well as legislative changes where these are necessary. There are some key reforms that the Commission believes will make significant improvements.

## Changes to the legislation

The Commission has identified certain pressure points in the legislation which need to be eased. The key legislative changes recommended by the Commission include:

- Reformulating the “good government” withholding grounds which are presently unclear and confusing;
- A new withholding ground to protect competitive position and financial interests (in addition to the existing commercial withholding ground);
- A new withholding ground to protect information provided in the course of a statutory investigation or inquiry that might be prejudiced by disclosure;
- Adjusting the grounds for refusing requests which impose too great a workload on agencies by creating clearer lines for refusing vexatious requests, requests that fail to provide enough detail to be processed efficiently, and requests that would unreasonably divert agency resources;
- Clarifying some aspects of process, such as dealing with urgent requests and partial transfers of requests;
- Strengthening requirements for consultation with and providing assistance to requesters before refusing requests on certain grounds;
- Giving advance notice to people and organisations whose information is liable to be released if there are privacy, commercial or confidentiality grounds for withholding it;
- Aligning the legislation with government policy about the proactive release of information by creating a new Part to cover proactive release (explained below);
- Creating new statutory oversight functions (listed below);
- Increasing the reach of the legislation by including additional agencies within its scope, either fully or partially, such as the courts and certain parliamentary agencies;
- Greater alignment between the OIA and LGOIMA, and clarifying their relationship with each other and with other legislation such as the Public Records Act 2005;
- Rationalising aspects of the Ombudsmen’s complaints process, filling gaps in the complaints jurisdiction, and strengthening enforcement through the courts of the Ombudsmen’s recommendations.

## A new Act

The Commission has carefully considered the case for either amending or replacing the legislation with fresh drafting. Although the recommended reforms are targeted to particular problems, and could be achieved through amendments to the Acts, the Commission has identified a number of factors which point to replacement of the legislation as the best option. These include:

- The central public and constitutional importance of the legislation justifies priority being given to improving its quality and accessibility;
- Some significant new policy directions make a new Act desirable;
- The number of amendments to be made would make an Amendment Act unwieldy;
- There would be an opportunity to address updated and obscure language in the Acts, given their age;
- Some of the provisions are unduly complicated and could do with some reorganisation according to the principles of modern drafting;

- There would be an opportunity to reorganise the Acts' provisions in a more logical way to make the process more user-friendly and to improve decision-making in key areas such as applying the public interest test;
- There would be an opportunity to consider combining the OIA and LGOIMA.

## Guidance

The Commission has identified a clear need to improve guidance about how the legislation works in practice, in particular, the greater use of case examples to illustrate best practice decision-making in a more accessible way. This will involve priority being given to publishing more of the Ombudsmen's case-notes and to revamping the Ombudsmen's guidance. The Commission sees improved guidance as one of its most important recommendations.

The priorities for guidance recommended by the Commission include:

- The public interest test, as it applies to the non-conclusive withholding grounds;
- The public interest factors relevant to the commercial withholding grounds;
- The operation of the privacy withholding ground including public interest balancing where the interests of children are involved;
- The operation of the maintenance of the law withholding ground;
- Processing issues for agencies such as dealing with urgent requests and interactions between agencies over requests;
- Consultation and transfers of requests between departments and ministerial offices;
- Planning information releases as part of the policy development process;
- Examples of information that should be proactively released unless there are good reasons not to;
- Guidance about the legislation specifically for requesters.

Guidance on these topics would be developed by the Ombudsmen, sometimes in conjunction with other relevant agencies. Some topics would be developed by a new oversight office recommended by the Commission (i.e. guidance for requesters, and guidance about proactive release).

## Proactive release

The OIA and LGOIMA deal primarily with requests for particular information to be released to an individual requester. The Commission recommends adding a new Part to the legislation to cover broader releases of information to the public. It proposes a statutory duty on all public agencies to take reasonably practicable steps to proactively make official information publicly available.

Many agencies already proactively release a lot of useful information. The government has directed government departments to take steps to release high value data and encourages other public agencies to do the same in the Cabinet's *Declaration on Open and Transparent Government*. The aim of the new statutory duty is to support the government directive in legislation to ensure that this practice becomes widespread across public agencies. The aim is also to clarify the process to be followed and the factors to be taken into account, so that important interests such as privacy, commercial sensitivity, and government interests are not overlooked.

The Commission's recommendation is a flexible one that requires only that agencies take reasonable steps towards proactively releasing information. It does not mandate that agencies release any particular type of information, but leaves agencies to develop their own proactive release strategy. What is reasonable, of course, would depend on the circumstances, such as the nature of the information, the public interest in its release, and the nature and resources of the agency. Some agencies may not have to do much more than they currently do to fulfil this new duty; others may have to take additional steps to bring themselves into line with expectations, though in most cases, meeting the government directive would also act to fulfil the new duty.

## **Oversight**

One of the largest gaps the Commission identifies is the lack of statutory functions to carry out the range of activities needed to support the purposes of the legislation. The one existing statutory function is the complaints function carried out by the Ombudsmen. The Commission recommends that the Ombudsmen continue to carry out the complaints function and that the Ombudsmen's unofficial guidance function be formalised.

In addition, the Commission recommends a new set of statutory functions covering:

- Policy advice; including co-ordinating policy and practice across government and advising on the regulation of official information;
- Review of agency practice and investigating complaints about the operation of the legislation;
- Statistics: ensuring that essential statistics on the operation of the legislation are kept;
- Promotion of best practice: including developing best practice models and cross-agency guidelines;
- Oversight of training for officials;
- Oversight of guidance for requesters, for example, through a dedicated website;
- Annual reporting to the relevant Minister on the operation of the official information legislation.

The Commission puts forward a number of other ways the new statutory functions could be allocated, including creation of an Information Commissioner's Office or co-locating the oversight functions with other information responsibilities such as the Chief Government Information Officer within the Department of Internal Affairs. Exactly where the oversight functions should be placed will depend on a number of organisational factors that go beyond the scope of the Commission's review; but the Commission puts forward five guiding principles that would see the functions carried out by one permanent and accountable office holder established by statute that is integrated with the wider strategic management of government held information.

## **Local Government Official Information and Meetings Act**

Most of the Law Commission's recommendations apply equally to both the OIA and LGOIMA. However, there are some differences in the legislation reflecting the different context between central and local government.

The Law Commission's recommendations that relate specifically to the LGOIMA include the following:

- The purpose of the LGOIMA should be expanded to include “increasing progressively the availability of official information to the people of New Zealand,” as per the OIA;
- Information held by contractors should be deemed to be held by the local authority (and therefore potentially available for release) as per the OIA, rather than depending on whether the local authority is contractually entitled to access the information;
- The power of a local authority to “veto” an Ombudsmen's recommendation that information be released, should be replaced with a veto power exercisable by the Cabinet, as per the OIA veto; and
- Council controlled organisations should remain subject to the LGOIMA.

### **Further work**

The Commission identifies a number of areas where further policy work is desirable to support the optimal operation of the legislation. It recommends:

- A working party to look at whether a new withholding ground is needed to protect culturally sensitive information that relates to tikanga Māori (using the current LGOIMA withholding ground as a starting point);
- A review of charging policy to establish a new charging framework that is cohesive, consistent and principled (using objectives identified by the Commission as a starting point);
- Addressing the interaction between the official information legislation and the New Zealand Government Open Access and Licensing framework (NZGOAL) as to release and re-use of information;
- A working party to review the current list of entities covered by the OIA and LGOIMA with a view to eliminating anomalies and adding entities that should be included, based on the principles identified by the Commission. The Commission considers this review in particular is urgently needed.

*For further information see the following chapters of the report:*

- *The legislative vehicle (chapter 16)*
- *The good government withholding grounds (chapter 3)*
- *Protecting commercial interests (chapter 5)*
- *Statutory investigations and inquiries (chapter 7)*
- *Adjustments to refusal grounds (chapter 9)*
- *Clarification of process (chapter 10)*
- *Consultation with and assistance for requesters (chapter 9)*
- *Proactive release (chapter 12)*
- *New oversight functions (chapter 13)*
- *The scope of the legislation and which agencies it covers (chapter 14)*
- *Alignment between the OIA and LGOIMA and clarifying the relationship with other legislation such as the Public Records Act (chapter 15)*
- *Guidance (chapter 2)*
- *Public interest test (chapter 8)*
- *Privacy (chapters 6 and 12)*
- *Maintenance of the law (chapter 7)*
- *Consultation and transfers of requests between departments and Ministers (chapter 4)*
- *Planning release as part of the development of the policy process (chapter 4)*
- *Protecting culturally sensitive information (chapter 7)*
- *A review of the charging framework (chapter 10)*
- *Addressing the interaction with NZGOAL (chapter 10).*