

## Emergency Management Otago 2018-2028 Group Plan Request for Feedback

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Please provide your feedback on the draft document **Emergency Management Otago Group Plan**.

Your feedback will be processed and analysed, and then we will work with other key stakeholders, and develop amendments

Please complete this form, and email it to [submissions@otagocdem.govt.nz](mailto:submissions@otagocdem.govt.nz) by **5pm April 29, 2019**

Please complete the relevant box below to support your submission

Submitters details for members of the public	
Name (first and last)	
Address	
Town/City	
Region	
Email address	
Phone number	
Would you like your submission to be heard in person?	

  

Submitters details on behalf of an organisation or business	
Name (first and last)	Patricia McLean
Organisation	Queenstown Lakes District Council
Position	Policy Advisor
Please confirm you have the authority to submit on behalf of your organisation.	Yes I have the authority to submit these comments on behalf of my organisation <i>Electronic signature provided</i>
Email address	submissions@qldc.govt.nz
Phone number	03 441 0499
Would you like your submission to be heard in person?	Yes

# Emergency Management Otago 2018-2028 Group Plan Request for Feedback

Please complete the box below if you are making some general comments to the summary of the plan.

## General comments

**PLEASE REFER TO THE FULL SUBMISSION LETTER – THIS TEMPLATE ONLY REFLECTS EDITORIAL POINTS.**

**QLDC wishes to be heard in relation to the submission.**

Key opportunities for improvement to the Group Plan include:

- 1.1.1 Update QLDC population data
- 1.1.2 Respond to peak visitor numbers
- 1.1.3 Group resourcing needs group governance
- 1.1.4 Revise reflections on visitor behaviour
- 1.1.5 Place greater emphasis on the role of climate change
- 1.1.6 Recognise that the TLA is the trusted source of truth for its community
- 1.1.7 Improve strategic alignment and accuracy of language
- 1.1.8 Reduce the emphasis on Dunedin – provide captions to images
- 1.1.9 Increase the visibility of Mana Whenua and the use of Te Reo
- 1.1.10 Provision of the document in Easy Read format

If you wish to make a submission on specific areas of the full Group Plan please use the box below

Page	Under Primary Header	Comments
10	Objectives and Activities	<ul style="list-style-type: none"><li>• Point 4 – Are these ORC or Group activities? Clarification required.</li><li>• Point 5 – Are the plans for adverse events related to lifeline planning? Clarification required.</li><li>• Add KPIs to align with the objectives and activities – demonstrate how these link to the KPIs and activities listed under the 4Rs.</li></ul>

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11	Statutory Requirements of the Plan	<ul style="list-style-type: none"> <li>Local risk reduction (box) – the hazards mentioned are related to Dunedin, not inclusive of the wider region.</li> <li>Pg 12- inclusion of the Sendai Framework feels unnecessary. Either remove entirely or provide greater explanation of what the framework entails.</li> </ul>
14	Community Context	<ul style="list-style-type: none"> <li>Recommend considering a change to the header to “Strengthening our Community Resilience”, or similar. Currently it has an overt focus on Hazard and Risk rather than resilience. Community/societal resilience is a core theme for the Group Plan, National Disaster Resilience Strategy and Sendai Framework and this would be a good section to set the scene.</li> <li>Recommend that this section is enhanced to provide a more detailed overview of what Community Resilience relates to. Aspects from Chapter 7 of the National Disaster Resilience Strategy could be included which explains that resilience relates to social, cultural, economic, built, natural, and governance factors. Of particular value is the following community resilience goal statement “<i>It promotes integrated, collective, holistic approaches with the goal of linking bottom-up, grassroots endeavours, with top-down policy and programmes that empower, enable and support individuals and communities.</i>”</li> <li>As outlined in our response to the National Disaster Resilience Strategy - recommend including in this section reference to the probable spontaneous volunteering contribution of ordinary people during a disaster situation in the role of “Citizen Responders<sup>1</sup>”. There are two key opportunities in acknowledging and developing the citizen responder role: <ul style="list-style-type: none"> <li>Citizen responder as engaged participants: many people caught up in a disaster situation are able and will take on a participatory rather than a passive role. This scenario should be reflected in the Plan as an expected, rather than unexpected outcome. This will help encourage communities and individuals, who are usually the first on the scene, to develop an understanding of how they might respond in a coordinated manner. This then draws a focus towards the value of Community Response Plans.</li> </ul> </li> </ul>

<sup>1</sup> Whittaker, J., McLennan B., & Handmer J., “A review of informal volunteerism in emergencies and disasters: Definition, opportunities and challenges”, *International Journal of Disaster Risk Reduction* 12 (2015) 358-368

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		<ul style="list-style-type: none"> <li>○ Citizen responder as effective support: Citizen Responders can be a valuable and skilled resource for formal responders who may not always be on ground immediately. The Plan could take a broader view of “informal volunteerism”, including the role of “digital volunteers” who can deliver effective “real-time” communications during emergency situations.</li> </ul>
15		<ul style="list-style-type: none"> <li>● All references to local faults are Dunedin-focussed. Please broaden the references.</li> <li>● “the importance of primary production, processing <u>and tourism</u> to Otago’s economy. Please adjust and include amended wording.</li> <li>● References to visitors and visitor behaviour should be amended as per the attached letter.</li> <li>● Update QLDC population statistics as per the attached letter.</li> </ul>
17 and 18	Reduction	<ul style="list-style-type: none"> <li>● Recommend that page 6 “4 R’s” is moved to pg 16 to provide a clearer scene setting introduction to the proceeding chapters on Reduction, Readiness, Response and Recovery</li> <li>● Recommend that the Reduction section is reviewed to assess which bullet points are appropriate to Reduction and which should be under Readiness and Response. Suggested changes include: ISSUES and PRIORITIES               <ol style="list-style-type: none"> <li>1. “Business Continuity Planning is inconsistent across the region, with many organisations not prioritising this activity”- Move to Readiness</li> <li>2. “Inconsistent lines of communication across all agencies, organisations and responders can hinder a coordinated response”- Move to Response.</li> <li>3. The bullet point “Many physical risk reduction efforts in Otago... “could be split with the flood mitigation statement remaining under Issues and Priorities and the AF8 Safer Framework and Building Code statement being shifted to Opportunities and Strategies .</li> </ol> <p>OPPORTUNITIES AND STRATEGIES – Rename as Objectives (as per attached letter)</p> <ol style="list-style-type: none"> <li>1. Include “Earthquake Prone Buildings Legislation” as a new bullet point. This legislation forces an improvement in risk reduction through the identification and remediation of potentially EP buildings</li> <li>2. Include reference to “TLA Risk Management frameworks for identifying and mitigating local risks such as business continuity (e.g. IT cloud mitigation), infrastructure (3 waters resilience programs) and community assets (e.g. facility strengthening)”</li> </ol> </li> </ul>

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		<ol style="list-style-type: none"> <li>3. Include reference to “TLA Annual and Ten Year Plan Capital Expenditure programmes as a key driver for improving and enhancing local infrastructure resilience”</li> <li>4. “GIS Technology can be utilised...” – Move to Readiness</li> <li>5. “There is an opportunity to learn lessons from others...” – Move to Readiness</li> </ol> <ul style="list-style-type: none"> <li>• Align KPIs with relevant activities listed in ‘how will we get there’ as per the attached letter.</li> <li>• Recommend that the KPIs be reviewed for improvements. Facebook surveys and web traffic counts carry little statistical credibility or empirical value in measuring reduction progress. It would be good to see one that reflects visitor dynamics in the CDEM space. Quantitative measures relating to risk reduction or risk governance activities would be preferable e.g IT readiness based on Cloud hosting</li> <li>• Pg 18 - unless the table is referring to a true best practice comparative benchmark, it may be preferable to refer instead to a “baseline”.</li> </ul>
19	Readiness	<ul style="list-style-type: none"> <li>• Recommend that “opportunities and strategies” be re-titled “relevant strategies and plans” or included within the “statutory and policy framework” section.</li> <li>• Under ‘issues and priorities’ address organisational Business Continuity Planning too.</li> <li>• Rename ‘Opportunities relating to readiness’ as ‘Objectives and:             <ol style="list-style-type: none"> <li>1. Include reference to “Promote greater levels of engagement and volunteerism for Community Response Groups”</li> <li>2. Include “Improve the level of Emergency Management knowledge and capability across sectors, agencies and community groups”</li> <li>3. Include “Further development of sector steering groups e.g. Emergency Services, Welfare, Tourism Operators to help improve readiness, develop relationships and strengthen interoperability capability”</li> <li>4. Include “Opportunity to provide a robust, standardised training program for all key EOC functional roles”</li> <li>5. Include “Opportunity to review local pre-plans for Emergency Management scenarios (e.g. fire, landslides, pandemics) as a regular collaborative inter-agency activity</li> <li>6. Include “Opportunity to deploy and leverage new technology systems and cloud based platforms (e.g D4H, ArcGIS) to assist with the development of emergency readiness</li> <li>7. Include “Opportunity for increased collaboration and communication at a governance level between TLAs and Emergency Management Otago Director”</li> </ol> </li> </ul>

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		<ul style="list-style-type: none"> <li>• Align KPIs with relevant activities listed in ‘how will we get there’ as per the attached letter. Examples for consideration:               <ol style="list-style-type: none"> <li>1. “Engage with service groups... in partnership with local councils twice a year” and “Hold at least one public event ...”- These are potential KPIs that link to the OPPORTUNITY around “Increased collaboration and communication with our partner agencies and communities”</li> <li>2. “Convene at least one meeting annually between Emergency Management Otago Director and the CEs and mayors...”- This is a potential KPI that relates to the recommended OPPORTUNITY around increased collaboration and communication at a governance level between TLAs and Emergency Management Otago Director</li> </ol> </li> <li>• Recommend that the KPIs be reviewed for improvements. Facebook and Twitter subscription levels offer minimal value in measuring Response progress. The readiness engagement KPIs mentioned above could be preferable. KPIs relating to pre-plan reviews could also be considered along with more quantitative measures around training (e.g % of EOC staff who have completed CIMS4).</li> <li>• Pg 21 - unless the table is referring to a true best practice comparative benchmark, it may be preferable to refer instead to a “baseline”.</li> </ul>
22	Response	<ul style="list-style-type: none"> <li>• Recommend the following considerations for ISSUES AND PRIORITIES:               <ol style="list-style-type: none"> <li>1. Expand the “In an extreme event, infrastructure failure may hamper response” to include more detailed points around Lifeline failures that could significantly impact the Emergency Coordination response. Specifically this could include failure of telecommunications, power, and transport routes which will impact the ability of local EOCs to function effectively</li> </ol> </li> <li>• Rename ‘opportunities and strategies’ as ‘objectives’. Recommend the following::               <ol style="list-style-type: none"> <li>1. Include “Opportunity to improve the robustness and redundancy of ICT systems and equipment to ensure that an adaptive communication networks can be established under a response scenario”</li> <li>2. Include” Opportunity to improve the knowledge and capability of community and agency stakeholders with regards to Communication Plans and ICT equipment usage (e.g. VHF, Satellite phones)</li> </ol> </li> <li>• Recommend the following considerations for HOW WILL WE GET THERE               <ol style="list-style-type: none"> <li>1. “Develop training plans for key functional roles” and “provide training opportunities and pathways for all response team members”– Move to Readiness</li> </ol> </li> </ul>

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		<p>2. Emphasise and enforce the importance of both the TLA's channels and the Group's channels as part of the seamless delivery of support and service as per the attached letter.</p> <ul style="list-style-type: none"> <li>• Pg23 -unless the table is referring to a true best practice comparative benchmark, it may be preferable to refer instead to a "baseline".</li> <li>• Pg 24- Community Response Plans- recommend that this page is moved to Community Context/Strengthening our Community Resilience section as it relates specifically to community resilience</li> </ul>
25	Recovery	<ul style="list-style-type: none"> <li>• Recommend removal of the paragraph "Recovery generally operations within discrete legislative powers..." This statement runs counter to the Amendment Act (2016) provisions for creating a more structured legislative framework for recovery management through transition periods and the transfer of Powers from Controller to the Local Recovery Manager</li> <li>• Pg26 – Recovery objectives could be retitled 'Recovery Principles' as per the attached letter</li> <li>• Pg 27 - unless the table is referring to a true best practice comparative benchmark, it may be preferable to refer instead to a "baseline".</li> </ul>
28	Management and Governance	<ul style="list-style-type: none"> <li>• Pg32 – The section on financial arrangements needs revision and a little more detail.</li> </ul>
35	Operational Arrangements	<ul style="list-style-type: none"> <li>• Recommend consideration of including reference to Health and Safety considerations within the operational arrangements section. The focus on keeping all Emergency Management stakeholders safe in line with the Health and Safety at Work Act 2015 (HSWA) is a critical requirement. A subset of this is the documentation of all decisions from the Controllers call and meeting log. The importance of this should be clearly stated.</li> <li>• Recommend consideration of including reference to the responsibility for identifying additional resources to support the group response. This should sit outside of the decision-making of the ORC.</li> <li>• Pg 36- The fours modes of Operation: Monitor, Engage, Assist, Direct are different to those often used by local TLAs. For example QLDC refers to: Monitor, Support, Coordinate, Direct. The actions at a "Engage" level (such as consideration of a declaration) are also misaligned with the activation levels of QLDC (declaration would be considered at a Coordinate level)</li> <li>• Pg 39- Warnings/Notifications- Recommend that clearer reference is provided to the role of TLAs as a primary stakeholder in managing information alerts to their local community. Ideally the release of alerts should be a collaborative exercise that combine the regional level of oversight with the local level of knowledge. An example is</li> </ul>

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		<p>Flood warnings that should be issued jointly with TLAs to ensure the local context is correct and the message is accurate and delivered without any surprises</p> <ul style="list-style-type: none"><li data-bbox="539 357 1944 421">• Pg 43- Controllers- Recommend consideration of including “These external Controllers will only be deployed into a local emergency in consultation and with the express agreement of the local Controller”.</li></ul>

*To add another row: Right click in the last row, choose 'insert', then 'insert row below'*