

31 May 2022

Kia ora [REDACTED]

**Your Official Information Act request, reference: GOV-018135**

Thank you for your email of 6 May 2022, asking for the following information under the Official Information Act 1982 (the Act):

*Please provide the policy, process procedures or rules for a client's information leaving ACC's possession to be given to another person, organization or person.*

*Also, it would be helpful if the following questions could be answered?*

- 1. Does the client get notified when their information is being given to a party outside ACC or only in particular circumstances?*
- 2. What records must ACC keep of the information being shared with another party - does this include a list of documents?*
- 3. Are there any extra checks in place when sensitive claim information is provided to a party outside of ACC?*
- 4. Is there any difference to these rules if that party is ACC's external lawyer?*
- 5. Please explain the ACC6173 and if there are any other forms or steps in the process it involves.*

**The attached appendix provides information on the collection and sharing of information**

The steps ACC takes to ensure we appropriately communicate with clients when their information is going to be shared, are included in the documents listed below, and are attached:

- Obtain Client Authority to Collect Information
- Privacy check before disclosing information Policy
- Prepare and Complete Sensitive Claims Document Release (Provider Only)
- Respond to a Government Agency Information Request
- Respond to a private insurer request for client information
- Respond to Family Violence Initiative Information Request
- Summary of the Health Information Privacy Code Policy

We have excluded staff names from the attached documents as these were deemed out of scope of your request. Please note that staff named are only content matter contacts for internal questions.

**As a health agency, ACC is bound to comply with the Health Information Privacy Code**

All ACC staff must adhere to their statutory obligations under the Health Information Privacy Code 2020 (HIPC) when sharing health information. ACC is obligated to make clients aware their information is being collected, and the need and purpose for this, as set out in Rule 3 of the HIPC.

The HIPC authorises agencies sharing health information for a number of reasons, including the following:

- that the disclosure of the information is one of the purposes in connection with which the information was obtained
- the individual concerned gives their permission.

When a client's health information is shared with a third party, this is recorded in a client's Eos file. A client can request a full copy of their file, or parts of their file, at any time.

**When an external lawyer is engaged by ACC**

ACC engages external lawyers to provide it advice as well as representation in Court. ACC is not required to obtain permission before it discloses information as this is protected by solicitor-client privilege, as is the nature of the advice being sought. The nature of the relationship between lawyer and client (in this case ACC) means that the external lawyer is essentially 'standing in ACC's shoes.'

Any information disclosed to an external lawyer must be related to the advice or representation being sought.

**The ACC6173 is an information disclosure checklist**

The ACC6173 form is a standalone document, which is completed when ACC is sending information out to a client or a third party. The form may also be completed where some information from a client's file is disclosed.

**As this information may be of interest to other members of the public**

ACC may decide to proactively release a copy of this response on ACC's website. All requester data, including your name and contact details, will be removed prior to release. The released response will be made available [www.acc.co.nz/resources/#/category/12](http://www.acc.co.nz/resources/#/category/12).

**If you have questions about this response, please get in touch**

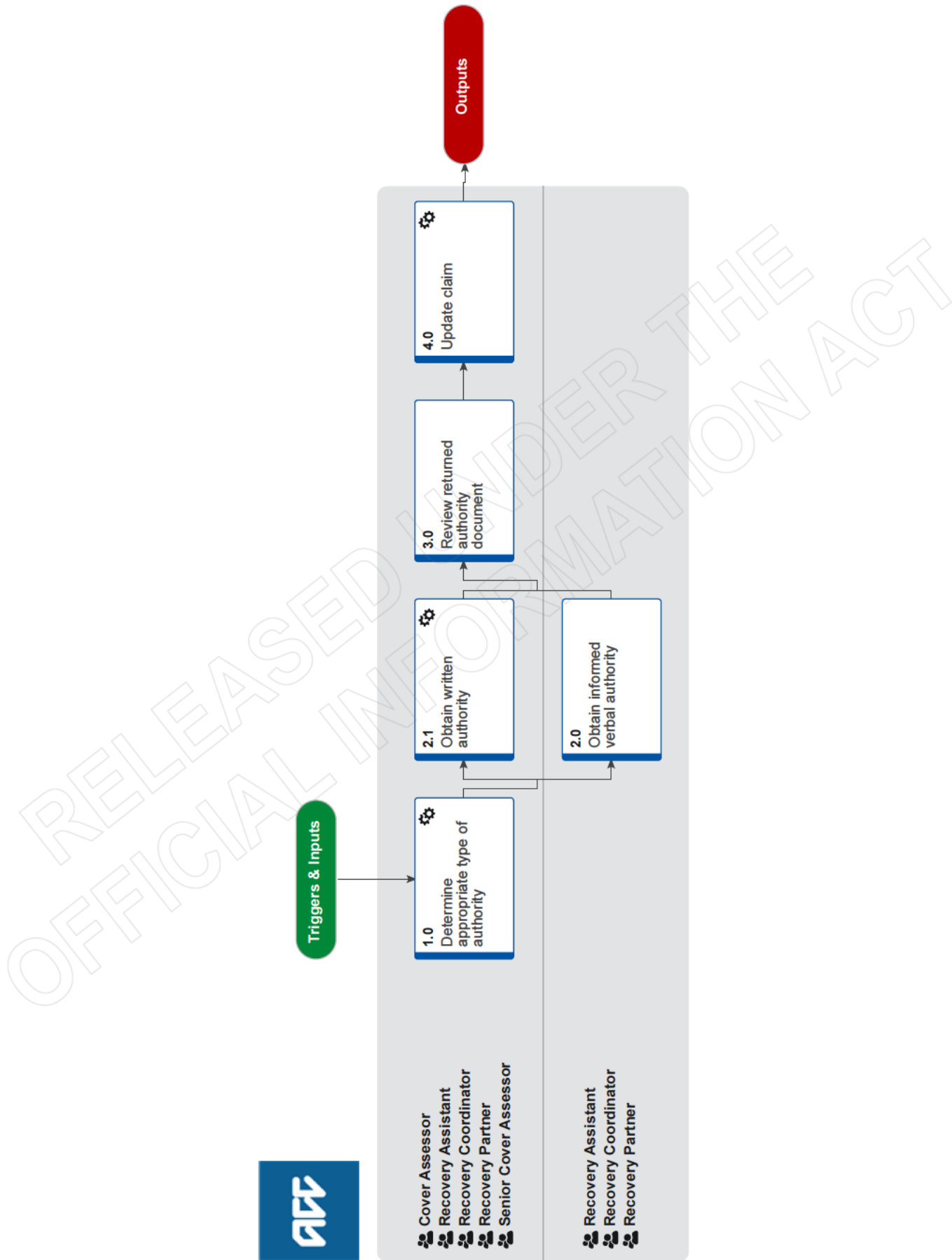
You can email me at [GovernmentServices@acc.co.nz](mailto:GovernmentServices@acc.co.nz).

If you are not happy with this response, you can also contact the Ombudsman via [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz) or by phoning 0800 802 602. Information about how to make a complaint is available at [www.ombudsman.parliament.nz](http://www.ombudsman.parliament.nz).

Ngā mihi,



Sara Freitag  
**Acting Manager Official Information Act Services**  
Government Engagement & Support





## Summary

### Objective

To obtain verbal or written authority from the client so that we can collect relevant medical or other records.

### Background

Obtaining client authority to collect information is required when ACC needs to gather client medical or other records, and ensures our clients understand the type of information we might request and why.

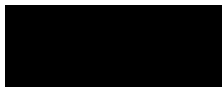
Use this process to either obtain:

- informed verbal authority during client onboarding to ensure the client is aware of what they've consented to when the ACC45 claim form has been lodged, or
- written authority via MyACC or an ACC6300 form when verbal authority is not appropriate.

Each time we request information about a client, we should first explain why we are collecting the information, and how we intend to use it.

ACC6300 Expire – As long as the ACC6300 is on the claim and the claim is actively managed there is no need to redo it. If the claim hasn't been active for more than a year and then needs to be managed again, redo an ACC6300 even if one was already on the claim. While waiting for a renewed 6300 to be completed, a verbal confirmation with the client that they are still happy to give consent and a contact made in the claim is enough to demonstrate that the client has provided interim authorisation. - Privacy Team

Owner



Expert

## Procedure

### 1.0 Determine appropriate type of authority

Cover Assessor, Recovery Assistant, Recovery Coordinator, Recovery Partner, Senior Cover Assessor

- a** In Eos, check what existing authority there is on the claim.

**NOTE** What if you view Client Authority through Claim on a Page (COAP)?

Claim on a Page will show if there is consent on the client's claim, but to view more details or make changes you will need to open the claim in Eos.

View Client Consent

**NOTE** What if your client is under 16 years of age?

Your client's parent, guardian or nominated person will provide the authority to collect information. When your client turns 16 they can give the authority themselves therefore you need to request authority from the client directly as per steps in this process.

Clients under 16 with complex mental injuries, require that you identify a Safe Contact. Your clients' Safe Contact or guardian can provide authority to collect information on your clients behalf. Depending on who your clients' Safe Contact is you will need to Obtain Authority to Collect Information and/or Authority to Act .

For more details refer to the information and process below.

**PROCESS** Identify Safe Contact

Children and Adolescents Consent

**NOTE** What are the different authority types?

There are five different authority types and a Conditions section on the Consent tab:

- ACC45: The ACC45 claim form that provides ACC with initial authority to collect information
- Verbal: A pre-recorded message played to the client during onboarding, to ensure they are informed of the authority they have previously provided on the ACC45 claim form and reaffirm this
- MyACC: The client has reviewed the authority terms and conditions and provided authority to collect information via MyACC. Eos creates the ACC6300D form as a record of the client's agreement.
- ACC6300: The client has reviewed the authority terms and conditions and signed their authority on the ACC6300 Authority to collect medical and other records form. Eos holds a record of this when it has been signed and returned
- Withdrawn: The client has advised they no longer give authority for any of the above authority types and we have 'Withdrawn' their authority. No records can be requested if the type is Withdrawn

Conditions: The client has provided authority to collect information in one of the ways above but they have also provided certain conditions to their authority. The conditions are recorded as comments in the Conditions text box.

- b** Determine if it's appropriate to request informed verbal authority or written authority using the Obtain Verbal or Written Authority Guidelines below or click on the Sharepoint link.

ACC45 vs ACC6300 (Sharepoint)

 NG GUIDELINES Obtain Verbal or Written Authority

**NOTE What if you need to obtain informed verbal authority during the Welcome Conversation?**

Go to Activity 2.0 Obtain informed verbal authority.

**NOTE What if the client's claim is active and has been open for 12 months?**

Progress to an ACC6300 via form or MyACC as noted in the 'NG GUIDELINES Obtain Verbal or Written Authority' above.


**NOTE What if you need to obtain written authority from the client?**

Go to Activity 2.1 Obtain written authority.

 Personal and Property Orders for Clients Policy

**NOTE What if the information is needed for the birth mother of an injured body is required?**

Send the ACC6301 – Authority to collect medical & other records – Birth Mother.  
Refer to Promapp page "Triage and Allocate Claim (Treatment Injury)" for more information.

 **PROCESS** Triage and Allocate Claim (Treatment Injury)

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## 2.0 Obtain informed verbal authority

Recovery Assistant, Recovery Coordinator, Recovery Partner

**a** Advise the client that we want to explain how we gather and use their information by playing a pre-recorded message. Confirm they are ready to listen to this.

**b** Play the pre-recorded consent message

**NOTE How do you play the pre-recorded consent message?**

1. Select "Invite More People" in the top right hand corner of the active call window
2. Enter the extension for the Verbal Consent Recording: 50013 and press OK
3. You will appear in a Conference with the Verbal Consent Recording and the Client
4. Once the consent recording has finished playing, it will automatically leave the phone conference

**c** Verbally confirm that the client agrees.

**NOTE What if the client requests a copy of what they have consented to?**

The consent is a pre-recorded message and can be emailed to the client if requested. Attach the Disclosure Statement - Consent Recording.

 Disclosure Statement - Consent Recording

**NOTE What if the client doesn't agree to the pre-recorded verbal authority?**

If they want to:

- provide authority in writing, fully or with conditions, go to Activity 2.1 Obtain written authority
- decline all authority options, go to the Decline or Withdraw Client Authority to Collect Information process.

 **PROCESS** Decline or Withdraw Client Authority to Collect Information

**NOTE How often do you need to update the authority to collect information when given verbally?**

Consider updating the consent indicator at 6 and 12 months post welcome conversation if the consent is verbal.

**d** Go to Activity 4.0 Update claim.

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## 2.1 Obtain written authority

Cover Assessor, Recovery Assistant, Recovery Coordinator, Recovery Partner, Senior Cover Assessor

**a** Discuss and confirm if the client would like to provide written authority via:

- MyACC
- an emailed ACC6300 Authority to collect medical and other records form
- a posted ACC6300 Authority to collect medical and other records form.

 ACC6300 Authority to collect medical and other records

**NOTE What if the client wants to use MyACC?**

Advise them to log in to MyACC and complete the authority on the Injury Details section.  
The ACC6300D will be uploaded to Eos automatically if provided via MyACC.

**NOTE What if the client wants it to be emailed?**

- Advise that they'll need to print, sign and scan the form back to ACC
- Check if the client's email address is verified. If not, got to Update Client's Party Record to verify the email address
- Email it to the client.

 **PROCESS** Update Client Party Records

**NOTE What if the client wants it to be posted?**

- Ensure they have a valid postal address
- Send a Send Letter task to the Recovery Administration department queue to request it to be posted.

**NOTE What if the client wants to provide their own conditions?**

- Discuss obtaining alternative conditions, using the Privacy - Authority Principles as a guide
- Request them to send their conditions in writing.

**NOTE What is the CLI01 letter and when should you use it?**

If you require the ACC6300 and the ACC165 to be completed by the client, you can use the CLI01Branch ACC6300 ACC165 Letter With Task - Client, which has the cover letter and the two forms attached.

You can also use this if you only require the ACC6300, just remember to remove the information about the ACC165.

As this letter has the cover letter already done it is a good way to send the form to the client.

 Privacy - Authority Principles

**NOTE What if the client doesn't agree to provide any authority?**

Go to the Decline or Withdraw Client Authority to Collect Information process. This process ends.

 **PROCESS** Decline or Withdraw Client Authority to Collect Information

- b** In the appropriate system Eos or Salesforce, create a Follow Up task for 10 working days from today to confirm the client has completed and provided their authority.

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**3.0 Review returned authority document**

Cover Assessor, Recovery Assistant, Recovery Coordinator, Recovery Partner, Senior Cover Assessor

- a** Receive the 'NGCM - Action Attached Documentation' task.

**NOTE What if you've received an NGCM - Action Attached Documentation task?**

Close the task as it's to inform you that the ACC6300 form has been uploaded to the claim.

- b** Review the written authority to confirm you understand and accept any conditions provided.

**NOTE What if the conditions need to be further clarified with the client?**

Contact the client to confirm the conditions and clarify any uncertainties.

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**4.0 Update claim**

Cover Assessor, Recovery Assistant, Recovery Coordinator, Recovery Partner, Senior Cover Assessor

- a** In Eos, add the applicable consent record type and any conditions on the Consent tab.

 Add Client Consent



## Summary

### Objective

When providing personal information to a client, client advocate, client lawyer, provider, supplier or employer, you must take care to protect individual privacy at all times. See also Responding to a request for official or personal information.

Owner

Expert

## Policy

### 1.0 Rules

- a You must check all incoming client documentation to ensure the information relates to the client and does not contain inappropriate or non-injury related information.

You must complete a content and privacy check before disclosing any personal information, even if we initiated the disclosure. A content check ensures we only give the information that was requested and is relevant. A privacy check ensures we only give information about the client who is requesting it.

You must also include an appropriate covering letter when providing requested information.

If sending information via email to an external email address make sure the email address has been verified in Eos first.

### 2.0 Privacy checking client information

- a Before you provide a copy of a client's personal information or file you must complete a privacy check to ensure that no other person's information is included.

The case owner or Client Information Requests team (CIR) is responsible for privacy checking full client copy files that they prepare.

For anything other than a minor enclosure you must add a 'Contact' in Eos noting that documents have been privacy checked prior to disclosure.

In particular, you must ensure:

- the recipient's name and address is correct and, if appropriate, check the 'Verification and 'Valid Address' statuses
- information about people other than the client is removed
- any information that may negatively affect the client's physical or mental health is discussed with their medical practitioner (e.g. GP or Psychiatrist) prior to release. If the medical practitioner agrees it may be harmful, we can withhold that information
- any information you send to a supplier is fit for purpose. Only provide what is required, particularly in respect to non-injury conditions.

Before you do the privacy check, clear your work area. If possible, use the dedicated privacy desk in your unit or an available empty desk.

### 3.0 Printing client information

- a Only print documents for one client at a time, unless you're batch printing and processing a bulk mailing of a standard letter. Make sure the number of letters matches the number of envelopes.

When you print client information you must:

- always use secure print or user box functionality to print enclosures
- always fasten documents using staples, not paper clips. When printing a multiple page letter use the Multi-functional Device (MFD) staple functionality, if available
- avoid using mail merge
- not put post-it notes on letters.



## 4.0 Enclosure types

- a** There are two types of enclosure, substantial and minor.

A substantial enclosure generally contains varied and potentially sensitive health information or multiple documents.

### **NOTE** Examples

- independence allowance report
- vocational independence report
- home and community support assessment report
- medical case review report
- complex social rehabilitation assessment
- lump sum independence allowance (LSIA) assessment

- b** A minor enclosure is routine correspondence or one or two short documents.

### **NOTE** Examples

- a 1 or 2 page letter, eg a letter approving home help
- a letter with a form or information sheet included
- a short report with limited medical information in it, eg a report about a simple injury such as a broken ankle that does not refer to pain issues or other medical conditions
- reimbursement claim forms

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## 5.0 When to use the ACC6173 Information disclosure checklist

- a** Full or partial copy file

If you're providing a full copy file or partial copy file you must complete an ACC6173 information disclosure checklist when you do the privacy check.

- b** Substantial enclosure

If you're providing a substantial enclosure completing an ACC6173 information disclosure checklist is optional. You may still find it useful to follow the checklist to make sure you don't miss anything.

- c** Minor enclosure

If you're providing a minor enclosure completing an ACC6173 information disclosure checklist is optional. But you must make sure that:

- the recipient's name and address is correct and, if appropriate, check the 'Verification and 'Valid Address' statuses
- information about people other than the client is removed
- any information that may negatively affect the client's physical or mental health is discussed with their medical practitioner (e.g. GP or Psychiatrist) prior to release. If the medical practitioner agrees it may be harmful, we can withhold that information
- any information you send to a supplier is fit for purpose. Only provide what is required, particularly in respect to non-injury conditions.

any information you send to a supplier is fit for purpose. Only provide what is required.

 ACC6173 Information Disclosure Checklist

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## 6.0 Client addresses

- a** You must check the 'Verification' and 'Valid Address' statuses of the client or authorised representative's physical address, and either verify or reverify by telephone or in person as needed.

Verify their address on first contact, and then either:

- at regular intervals
- before you provide any information by email, post or courier.

Only use a window envelope or labelope to display the address and make sure only the name and address are visible.

Always print the address from Eos using the CLI05 Address label and make sure Eos is set to default to the postal address.

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## 7.0 Changes to a client's residential or mailing address

**a** Changes to a client's residential or mailing address must be requested by either:


- the client
- someone with authority to act on behalf of the client. There must be a signed ACC5937 Authority to act form on the client's file.


We'll accept written notification of a change of address by letter, on a signed ACC form such as an ACC250, or on an ACC210 Change of bank account or address form. We will also accept a scanned copy by email. See Communication using email.


We'll accept verbal notification of a change of address from the client, after they confirm their identity by providing the attached information.

 ACC5937 Authority to act - Client

The client must supply their...	and either...
<ul style="list-style-type: none"><li>• full name, including middle names or any aliases</li><li>• date of birth</li><li>• full address, including suburb, town or city</li><li>• home or mobile phone numbers</li></ul>	<ul style="list-style-type: none"><li>• the date of the accident</li><li>• the type of injury sustained</li><li>• how the injury was caused</li><li>• their ACC number or ACC45 number</li></ul>

 Changes to a client's residential or postal address.PNG

 ACC210 Change of bank account or address

 Communication using email (Clients)

<https://au.promapp.com/accnz/Process/45278637-26cd-4f32-8f4e-aebf9f60b05b>

**b** Any time the client provides information that we can verify in Eos, make sure that you check the 'Verification' status and verify or re-verify as appropriate.

**c** A current Home address in Eos should always be a residential address.

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## 8.0 Temporary client addresses

**a** If the client has a temporary physical address, the client must specifically confirm that the temporary address is appropriate for ACC to send documents to. If they do, in Eos add the temporary address as the home address. Task to remember to update Eos once the client returns to their normal mailing address.

If the client does not request for mail to be sent to their temporary address, then do not change their home address to the temporary address. The client must collect the information from an ACC office.

You may send blank forms to a temporary address. They must not contain any client details.

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## 9.0 Alternative address

**a** An alternative address should only be used as a mailing address IF the current home address does not receive mail.

For example,

- where the client uses a PO box instead of receiving mail to their home address
- where the client is deceased, we should keep the address as their last physical address and load the details of their representative as the alternative address.

 Add or edit alternative address

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## 10.0 Client email addresses

**a** Ensure you:

- only use a verified client email address in Eos
- create emails and attach documents from within Eos
- complete a privacy check
- have disabled auto population of email addresses in Outlook

The "SmartGate" tool will also support a targeted second check for emails sent externally which include any attachments, or client or customer identifiers.

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## 11.0 Provider and supplier addresses

- a** If you're an Eos user you must use Eos when checking provider and vendor addresses. See Searching for provider or vendor addresses in Eos. Make sure you compare the provider or vendor's contact details with those in Eos. If they need updating you must:

- ask them to email you their new contact details
- email the new details to the Provider/Vendor Registrations (PVR) team at Registrations@acc.co.nz and put 'Change contact details' in the subject line.

Or, the provider or vendor may email the PVR team with a copy to you. Physical and email addresses, phone and fax numbers are automatically updated in Eos from the Medical Fees Processing (MFP) system.

See also Communication using email.

 Communication using email (clients)  
<https://au.promapp.com/accnz/Process/45278637-26cd-4f32-8f4e-aebf9f60b05b>

**NOTE** What if a vendor/provider is no longer involved in a claim?

Once a vendor or provider is no longer actively involved in the claim, remove them from the participants list. This reduces the chance of incorrectly selecting them and appropriately disclosing information later on

 Manage Participants

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## 12.0 Delivery options for clients, client advocates, client lawyers

- a** If a client, their advocate, or their lawyer requests a copy of the client's file, we prefer to provide an electronic copy on a password protected CD or USB. You may send the CD or USB by post with an appropriate covering letter. See Responding to a request for official or personal information.

If they want a printed copy we prefer that they collect it from us. We do this to ensure their information is secure and only accessed by authorised people.

Only consider sending personal information by courier if specifically requested. See 18.0 'When to send client information by courier' below.

 Responding to a request for official or personal information


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## 13.0 Exception – Clients in prison

- a** If a client is in prison and they don't have an advocate, we can only provide them with a printed copy of their file. Clients in prison generally don't have access to computers. You must send them an INP12 Personal info request - provide info - clients in prison letter, which includes suitable wording for clients in prison about the risks of using a courier. Do not use the ACC6181 information sheet.

Please note that in most cases we'll need to write to a client in prison as we'll be unable to contact them by telephone. However, if you're able to phone a client who's in prison, you can record their preferred delivery method as a Contact in Eos. Do not release the information until you receive the client's instructions.

If the client has not nominated a lawyer or advocate for us to send the information to, you must contact the client when their information is ready to advise that we will prepare a paper copy to be couriered to the prison. The client will need to be made aware that prison staff check all incoming packages, which may include their package.

 Preparing client information in a CIT

 FAQs about delivering personal information

<http://thesauce/team-spaces/chips/clients/information-disclosure-and-requests/reference/faqs-about-delivering-personal-info>

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## 14.0 Information for reviews and appeals

- a** If a full or partial copy file is required for a review or appeal, or a transcript of a review hearing, you may:

- ask the recipient to collect it from an ACC office
- send it to them by post on a password protected CD or USB
- send it to them by email within a password protected PDF if the file is small. This is not recommended for large files that need more than one email
- deliver it in person to the client if appropriate, after completing an identity check (eg. as part of a scheduled outreach visit).

Only send the information by courier if this is specifically requested. See 18.0 'When to send client information by courier' below.

Do not use post (if printed) to provide full or partial copy files, review transcripts or relevant documents that relate to a review or appeal.


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## 15.0 Collecting from an ACC office

**a** A requestor may collect their information or file from an ACC office:

- If the information is prepared at a different office, you must courier it to the appropriate ACC branch or unit to be collected. Double envelope the information before you place it in the courier bag
- You must check the person's authorisation and identification before handing over the information. Complete the ACC6179 form and upload to the claim)

For more information see Responding to a request for official or personal information.

 Responding to a request for official or personal information


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## 16.0 Sending information by email

**a** If using email to send or receive client information ensure you:


- remember the "one email, one client" rule. Each email you send, with or without attachments, must only refer to a single client or recipient
- send your email and attachments to a verified email address
- complete a privacy check
- check all email threads and delete any information that is not relevant to the client
- ask another staff member to double check attachments if you have any doubts about sending the information
- never use a Multi-Functional Device (MFD) to send documents outside of ACC
- use the "SmartGate" email notification to check all attachments before sending your email.

When sending a verification email from Eos, remove the party name from the 'Subject' field and replace it with "Please confirm your email address"

 The easy guide to email and messaging (ACC Sharepoint)

 Communication using email (clients)

<https://au.promapp.com/accnz/Process/45278637-26cd-4f32-8f4e-aebf9f60b05b>

 Risks associated with email communication (client)

<https://au.promapp.com/accnz/Process/Minimode/Permalink/EO1xLRwZ3TZnOXjSpT0Ubf>

 What to include in emails to clients, providers and employers

<https://au.promapp.com/accnz/Process/Minimode/Permalink/GLhB1JBrdpLc4GQrgfPdMi>

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## 17.0 When to send client information by post

**a** You can use post to send client information if it's a minor enclosure or it's on a password protected CD.

You can send substantial enclosures by post, however, you must:

- obtain the client's agreement for it to be posted, especially if it contains sensitive information
- record this agreement in Eos and make the client aware of the nature of the material in the enclosure
- check with the client before sending each enclosure.

If the client has any concerns about the material being posted then you must use an alternative delivery method, such as a courier.

You must carefully check the items that you place in the envelope to make sure:

- they relate to the right client, the right claim(s) and the right request
- multi-page items are stapled and there are no missing pages or extra pages attached.

Ensure the envelope is securely sealed before sending.

### **NOTE** Envelope peer checks

If you're sending more than one page, the Privacy Team highly recommend getting a colleague to check your letter before the envelope is sealed. This involves taking the documents out of the envelope and checking that they relate to the right client and are supposed to be included. Many privacy breaches have been prevented by a peer check!

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## 18.0 When to send client information by courier

- a You may only use a courier to provide information to a client, client advocate or client lawyer if you have the client's consent to use courier.
  - You must reconfirm consent separately for each information request
  - The client must specifically request delivery by courier
  - You must let them know the risks of sending their information by courier. See the ACC6181 Receiving personal information by courier information sheet

Before providing any information by courier you must:


- check the recipient's address including, if appropriate, the 'Verification' and 'Valid Address' statuses and the recipient's authority to receive the information
- place the information in a clearly addressed envelope or package before you put it in the courier bag.

For more details see Responding to a request for official or personal information.

-  ACC6181 Receiving personal information by courier
-  Responding to a request for official or personal information

### NOTE Exception

If the client is in prison, you must send them an INP12 Personal info request - provide info - clients in prison letter, which includes suitable wording for clients in prison about the risks of using a courier. Do not use the ACC6181 information sheet.

-  INP12 Personal info request - provide info - clients in prison

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## 19.0 Clients that live overseas

- a You may send personal information to a client if they live overseas.

You may only send client information to their advocate, insurer, representative or employer if you have the client's consent and the requestor has authority to act on behalf of the client. See the Privacy Act 2020, Principle 6, Subclause (1)(b).

The staff member preparing the password protected CD, eg case owner, is responsible for sending the disk overseas.

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## 20.0 Delivery options for suppliers, providers, GPs and employers

- a You may send documents by courier if requested by a supplier, provider, General Practitioner (GP) or employer. You must request a signature on delivery.

Only include information about one client in a package or envelope and make sure the package is clearly addressed before you place it in the courier bag.

If you need to send information about multiple clients, use a separate courier bag for each client. This applies to both printed information and password protected CDs.

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## 21.0 What to do when client information is returned to us

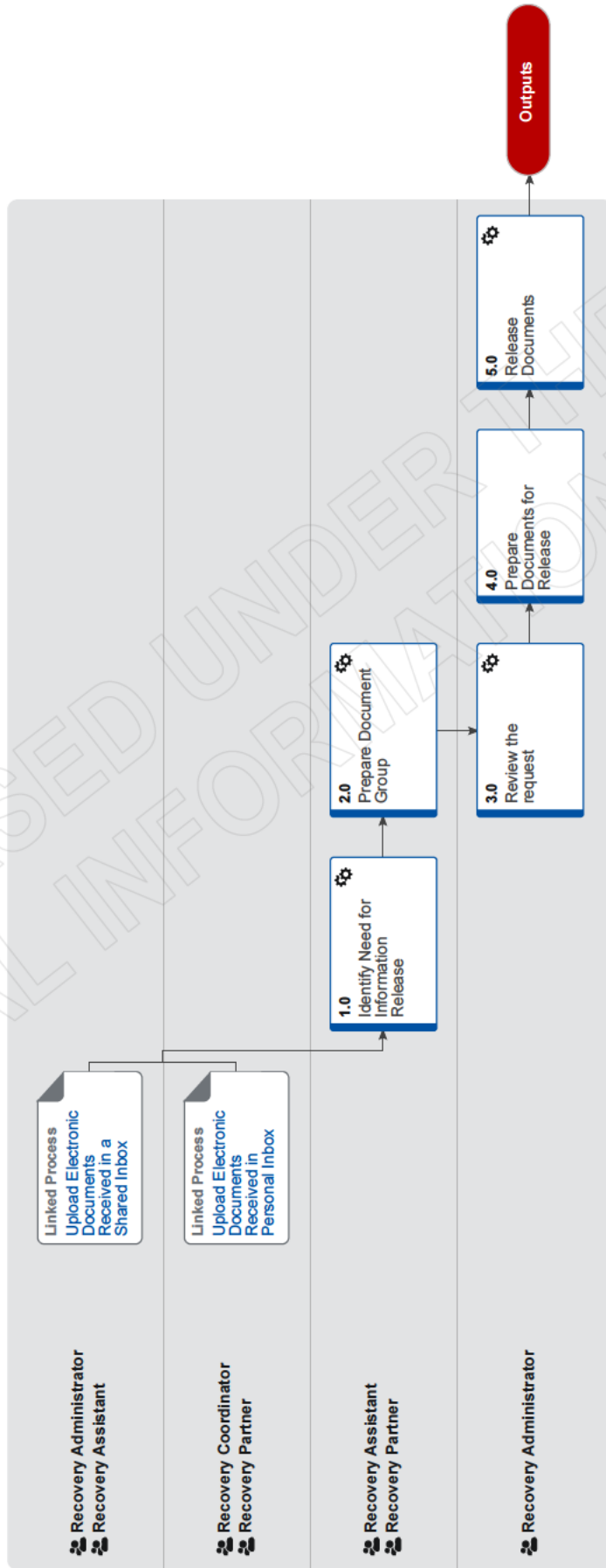
- a When someone returns client information to us, eg personal information that has been included with a referral to a provider or a copy file returned from a Review Hearing or Appeal, you must create a 'Contact' in Eos to record what's been received before you place the documents in the document destruction bin.

Create the 'Contact' at Claim level. If multiple claims are involved, create it at Party level.

Make sure you include:

- as much detail as possible about what was received, eg "Medical Case Review copy medical notes", "Appeal copy file" etc, and how it was received, eg sealed envelope, attached to provider report etc
- what you did with the documents, eg placed in secure document destruction bin, uploaded to claim file record etc, and any other relevant information.

# Prepare and Complete Sensitive Claims Document Release (Provider Only) v8.0



# Prepare and Complete Sensitive Claims Document Release (Provider Only) v8.0



## Summary

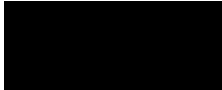
### Objective

To send Medical Notes, Assessment Pack, Assessment Report, IBSC reports and any other types of sensitive or confidential information to a provider.

### Background


ACC sends documentation out to external providers to assist with treatment, return to work activities etc.


Owner



Expert

## Procedure

 **PROCESS** **Upload Electronic Documents Received in a Shared Inbox**  
Recovery Administrator, Recovery Assistant

 **PROCESS** **Upload Electronic Documents Received in Personal Inbox**  
Recovery Coordinator, Recovery Partner

### 1.0 Identify Need for Information Release

Recovery Assistant, Recovery Partner

- a** Determine if the information release was initiated by ACC or requested by a provider and if appropriate, acknowledge receipt of the request with the provider.

**NOTE** **What if the information release is part of a Mental Injury Assessment?**


Go to 'Arrange Mental Injury Assessment for Cover' activity 4.0 Request assessment referral for instruction on how to prepare the documents for release. This process ends.

 **PROCESS** Arrange Mental Injury Assessment for Cover

- b** Confirm if the client has provided consent for the document release; either verbally, through email or the provider obtained consent and let us know.

**NOTE** **What if the client hasn't provided consent to release information?**

You will have to obtain consent verbally, through email or the provider will have to obtain the client's consent. Go to the 'Obtain Client Authority to Collect Information' process.

 **PROCESS** Obtain Client Authority to Collect Information

**NOTE** **What if the request does not contain sufficient information?**


Refer to the guidelines for 'Confirming requirements for client information requests' and obtain the additional information required.

 Confirming requirements for client information requests

- c** Contact the Provider to confirm their email address and contact number is correct before sending clinical records. If they are verbally confirming the email address and contact number, add on a contact in Salesforce with the details of the conversation and confirmation.

**NOTE** **What if the specified email address has not been verified?**

Go to 'Verify an Existing Provider, Vendor or Facility Email Address'.

 **PROCESS** Verify an Existing Provider, Vendor or Facility Email Address

**NOTE** **What if the specified contact number has not been verified?**

Send an email to the Provider Registration team (registrations@acc.co.nz) to advise them to add it to the provider party record.

In your email, include the following:

- Provider name
- Provider ID
- Contact number to add

### 2.0 Prepare Document Group


Recovery Assistant, Recovery Partner

- a** In Eos, check the claim for clinical records.




**NOTE What if there are no or incomplete clinical records on the claim?**

Double check the client's claim record for archived physical files or other historical information and notify the Lead provider and Assessor. If you need to obtain clinical records go to 'Request Clinical Records' process. Once received return to this process and continue by creating a document group, if needed.

 **PROCESS** Request Clinical Records

**b** Create a document group.


 Manage document groups

**c** From the 'Documents' tab add all the relevant documents.

**d** Perform full privacy and relevancy checks to ensure that the documents are relevant to the referral, do not contain any third party information and do not contain any other information that needs to be withheld.

**NOTE For further information refer to 'Privacy Check Before Disclosing Information Policy' and 'NG SUPPORTING Information Inbound and Outbound Document Checks'.**

 Privacy Check Before Disclosing Information Policy

 NG SUPPORTING INFORMATION Inbound and Outbound Document Checks

**NOTE What if you find information that needs to be redacted?**

Send an email to Recovery Administration (recoveryadmin1@acc.co.nz) and include the document to be redacted plus your redaction instructions, before adding the document to the document group.

 NGCM - Redact information from PDF documents

**NOTE What if there are documents from other claims that are relevant to the assessment?**

When a request for a referral is required and the supporting documents are on another claim, it is important to transfer the documents to the relevant claim. This will ensure the right documents support the recovery decisions for each claim.

To transfer documents from one claim to another:

1. Create a bulk print of all documents on the other relevant claim and complete mandatory fields and description
2. Open PDF document from email link
3. File the PDF away to the relevant claim
4. Repeat these steps if there is relevant documents on multiple relevant claims

The PDF should also be renamed something short but relevant, and identify which claim number the information came from, so it is included/printed in further referrals or copy files eg. Medical records and reports from claim: 100XXXXXXXXX.

Do not create a bulk print on one claim and then move it to another claim, renaming it and using it in a referral for advice as it will not appear in any file copy subsequently used.

 Manage document groups

**e** In Eos, generate a NGCM - Admin Request task, using the template below:

Password Protected Document Dispatch

Recipient(s) name:

Recipient(s) verified email and verified mobile phone number:

Reason for document dispatch:

Documents to send:

**NOTE What do you do if Mental Injury claim information needs to be sent with a referral on a Physical Injury claim?**

In Eos, manually transfer the Admin Request Task to the Recovery Administration department queue with the Sensitive Claims Administrator role.

**f** Check the vendor and provider are added as a participant on the claim if they are not already and provide the correct service code.

 Manage Participants

 NG GUIDELINES Purchase Order Details - ISSC

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### 3.0 Review the request

#### Recovery Administrator


**a** In Eos, open the task and review the document release request and the information to be emailed is one of the following:

- Medical Notes
- Assessment Pack
- Assessment Report
- Any other type of sensitive or confidential information



**NOTE** What if you don't have all the information you need?

If required information is missing from the task, or you need guidance on working within the Administration Team, refer to the link below.

 [NG PRINCIPLES Working in the Administration Team](#)


- b** Identify who the information should be sent to and who is to receive the information.

**NOTE** What if the vendor and/or provider is not a participant?

Return the task to the Recovery Team Member advising them that they need to add these participants before you can action this task.

**NOTE** What if the document release is not to go to a provider?

If the document dispatch is not initiated by ACC or requested by a provider go to the 'Complete Client Information Requests' process. This process ends.

 **PROCESS** [Complete Client Information Requests](#)

- c** In Eos, find documents or document group to be sent.
- d** Create a 'Bulk Print' or combine PDFs in Adobe Acrobat Pro DC if multiple documents/PDFs are to be dispatched.
- e** Select the following options when bulk printing;
- Purpose: 'External Referral'
  - Releasable to: 'Medical Provider'
  - Description Box: Name of recipient
- f** Save the document in your name specific folder in the Adobe Privacy Checks - Partnered folder with the initials of the client and claim number only.

**NOTE** What if you are unable to locate the Adobe Privacy Checks - Partnered folder?

Copy and paste the below link in file explorer to open the Adobe Privacy Checks - Partnered folder

\\ACCfiles\Data\BranchServers\HamiltonRegion\NGCM Launch Pad\Recovery Admin\Adobe Privacy Checks - Partnered

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## 4.0 Prepare Documents for Release

### Recovery Administrator

- a** Complete a three-point privacy check confirming the client's name, NHI number, date of birth is correct, and the information belongs to the client in question on all documents.

For further information around redactions, please refer to the Inbound and Outbound Document Checks document.

 [NG SUPPORTING INFORMATION Inbound and Outbound Document Checks](#)

**NOTE** What if you find information that needs to be redacted, such as third party information?

Send the task back to the Recovery Team Member, so they can complete a full privacy check.

- b** In Adobe Acrobat DC, open your Action Wizard Tool and click the Doc Dispatch action to add a Released to Provider header and page numbers.

**NOTE** What if you need to import this action into Adobe?


Double click the Doc Dispatch.sequ file in the team or Privacy Checks folder, to import this action to Adobe.

- c** Ensure this document is no larger than 10mb to ensure it can be filed away.

**NOTE** What if the file is larger than 10mb?

Try reducing the size through Adobe. If you still need to split the file, split it using 9.5mb as the maximum file size. If split, email each part separately.

- d** Add a password to the PDF in Adobe Acrobat DC through the Random Password Generator, ensuring the password doesn't start with a capital i as it can be mistaken for a lower case I, similar for the letter O versus the number 0).

 [Random Password Generator.xls](#)

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## 5.0 Release Documents

### Recovery Administrator


- a** In Eos, create email using the verified email specified in task.
- b** Attach password protected document from your name specific folder in the Adobe Privacy Checks - Partnered folder with the initials of the client and claim number only.

**NOTE** What if you are unable to locate the Adobe Privacy Checks - Partnered folder?

Copy and Paste the below link in file explorer to open the Adobe Privacy Checks - Partnered folder

\\ACCfiles\Data\BranchServers\HamiltonRegion\NGCM Launch Pad\Recovery Admin\Adobe Privacy Checks - Partnered

- c** Insert 'Sending password protected documents' template and edit accordingly.

 [Admin Template - document dispatch templates](#)

**d** Generate blank email from Outlook and send etxt to provider.

**NOTE What if you need to send an ETEXT or Email?**

Include the following information when sending an ETEXT or Email.

**ETEXT**

- To Field: eg, 0271234567@etxt.co.nz. – Number will be specified in task.
- Subject line: Initial of client and claim number.
- Body of email: Insert text template – edit accordingly

**EMAIL**

- Email: To Field: Verified email address from task
- Subject line: Assessment Type - Prepopulate client and claim details
- Body of email: Insert email template

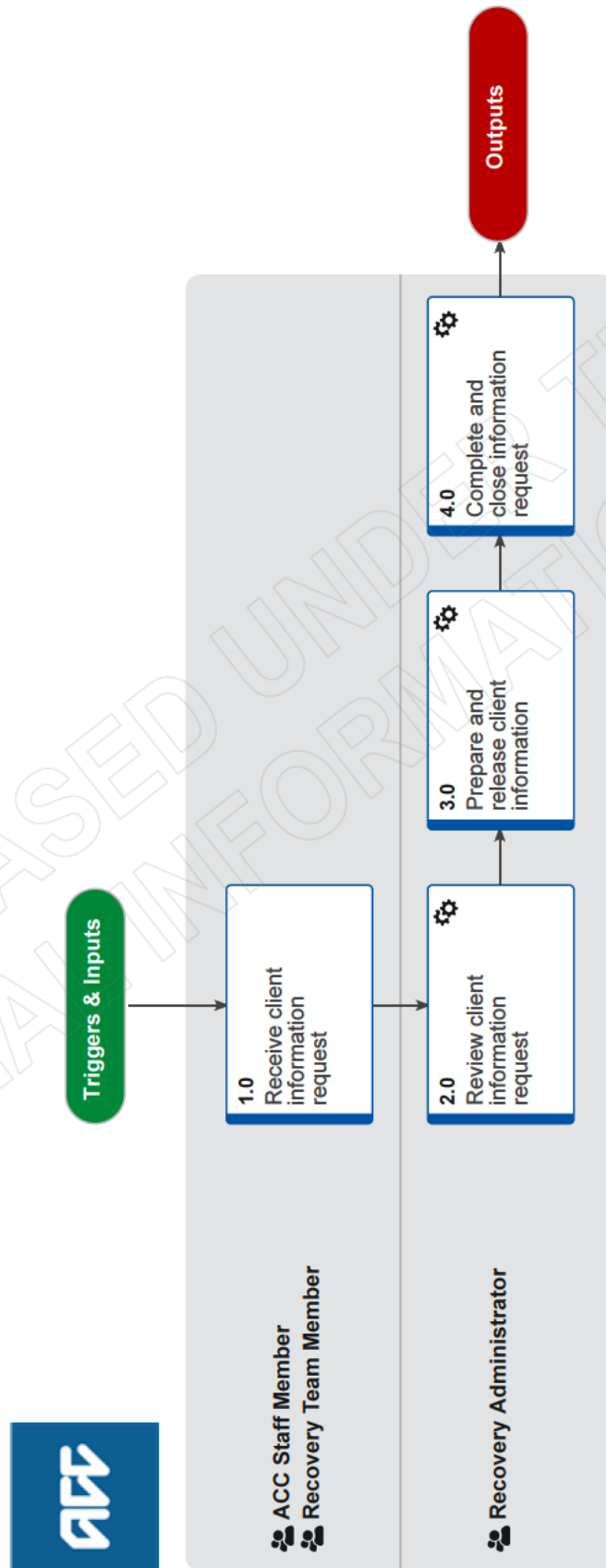
**e** Check document can be opened from email using password from etxt, before sending email and etxt.

**f** Add a contact in Eos, after you have sent the text from Outlook then from your sent items press forward, copy and paste the entire message into Eos as a contact. Add 'Password' to beginning of the contact.

**g** In Eos, close the 'NGCM Admin Request' task.

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RELEASED UNDER THE  
OFFICIAL INFORMATION ACT



## Summary

### Objective

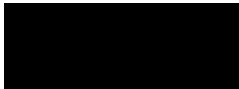
The purpose of this process is to provide client information within the legislative timeframes when ACC receives an information request from a government agency.

### Background

These information requests fall under the Official Information Act 1982 and have a deadline of 20 working days from the receipt of request.

This process is for staff in the Recovery Administration Team.

Owner



Expert

## Procedure

### 1.0 Receive client information request


ACC Staff Member, Recovery Team Member

- a If you receive a request for client information from a government agency, on the Recovery Plan create a 'NGCM – Admin Request' task for the Recovery Administrator to action and note the details.

### 2.0 Review client information request

Recovery Administrator

- a Review the task.
- b Check that the client's details on the request for information match Eos:
  - Customer name
  - IRD number
  - Date of birthThe last known address does not need to match. Refer to guidelines for 'Confirming requirements for client information requests'.

 NG GUIDELINES Confirming Requirements for Client Information Requests

#### NOTE What if the client's details on the information request do not match Eos?

If the details do not match, return the request to the relevant government agency, stating that the details do not match and we are unable to complete the request.

Select the appropriate email address:

For Inland Revenue, email: ChildSupportTauranga@ird.govt.nz

For the Ministry of Social Development, email: Client\_Support\_Debt\_Management@msd.govt.nz

### 3.0 Prepare and release client information

Recovery Administrator

- a Collate the requested information.

#### NOTE What information can IR or MSD request from ACC?

Inland Revenue (IR) and the Ministry of Social Development (MSD) can request information from ACC relating to a client's weekly compensation, ie how much we've paid the client and when.

- b In Eos, create an email for the requestor. Copy the requestor's questions and supply the information. It is a breach of the client's privacy to supply information that the requestor did not ask for. For examples of requests and additional guidance, refer to NG GUIDELINES Respond to a Government Agency Information Request.

 NG GUIDELINES Respond to a Government Agency Information Request

- c In Eos, send the email, using the details required for the government agency.

#### NOTE What details are required for the Ministry of Social Development?

Vendor code: VAQ371. Add as an 'Other Agent'.

Subject: MSD Information Request – Attn: [Requestor's name]

Send the email to: Client\_Support\_Debt\_Management@msd.govt.nz (unless specifically requested otherwise).

**NOTE** What details are required for Inland Revenue?

Vendor code: VAQ180. Add as an 'Other Agent'.

Subject: IRD Information Request – Attn: [Requestor's name]; Claim Number; ACCID

Send the email to: ChildSupportTauranga@ird.govt.nz (unless specifically requested otherwise).

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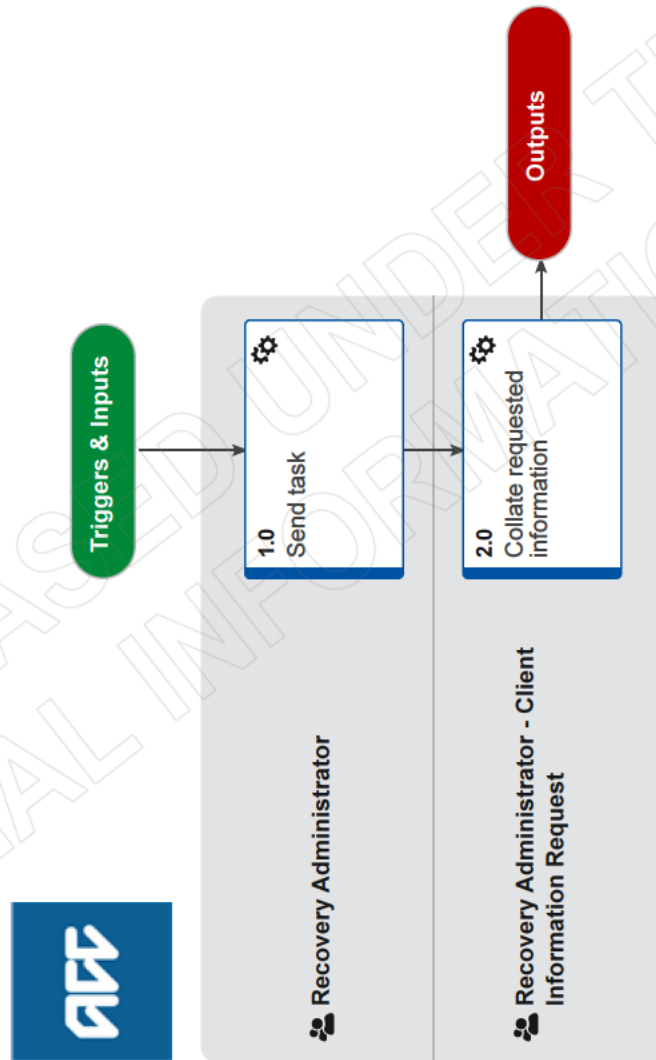
**4.0 Complete and close information request**

Recovery Administrator

- a** File the email correspondence in Eos.
  - b** Close the task in Eos.
- 

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# Respond to a private insurer request for client information v19.0



# Respond to a private insurer request for client information v19.0



## Summary

### Objective

The purpose of this process is to provide client information within the legislative timeframes when ACC receives an information request from a private insurance company.

### Background

These information requests fall under the Official Information Act 1982 and have a deadline of 20 working days from the receipt of request.

Owner

Expert

## Procedure

### 1.0 Send task

#### Recovery Administrator

- a In Eos, create a 'Complete Request for Copy of Client's Information' task. Begin the task description with 'Insurer request' and paste the information from the original task into the description.
- b The task will automatically Route to the Client Information Request Queue.

### 2.0 Collate requested information

#### Recovery Administrator - Client Information Request

- a Read the request in its entirety to establish the information that is being requested.  
For example, does the insurer want the current medical certificate and the gradual return to work plan?
- b Confirm the insurer has provided written authority from the client to release the information.  
**NOTE What if you cannot locate the written authority on the claim?**  
If the authority to release information form cannot be found on the claim, check the client's party record as sometimes other teams may have loaded the authority to release information form there.  
**NOTE What if the insurer hasn't provided written authority from the client?**  
Advise the insurer that they will need to provide this before we can release the information. This process ends.
- c Contact the client to confirm consent to release information to insurer. If you cannot contact the client or they do not provide consent, decline the request to the insurer pending consent from the client. This process ends.
- d Create a Bulk Print for the requested documents.

Bulk print details:

Purpose: Information Request

Releasable to: DO NOT RELEASE


Description: CIR - OIA (for full file request) or CIR - OIA - Partial (for partial request)

- e If insurer has asked any claim specific questions that will not be answered by the release of file, reply to request to answer these questions.

**NOTE What if you are unable to answer the question? Send a task to appropriate recovery team to provide an answer. (Link Promapp process for this).**

**NOTE What happens to the request?**

Go to Activity 2.0 Set up client information request in the process below.

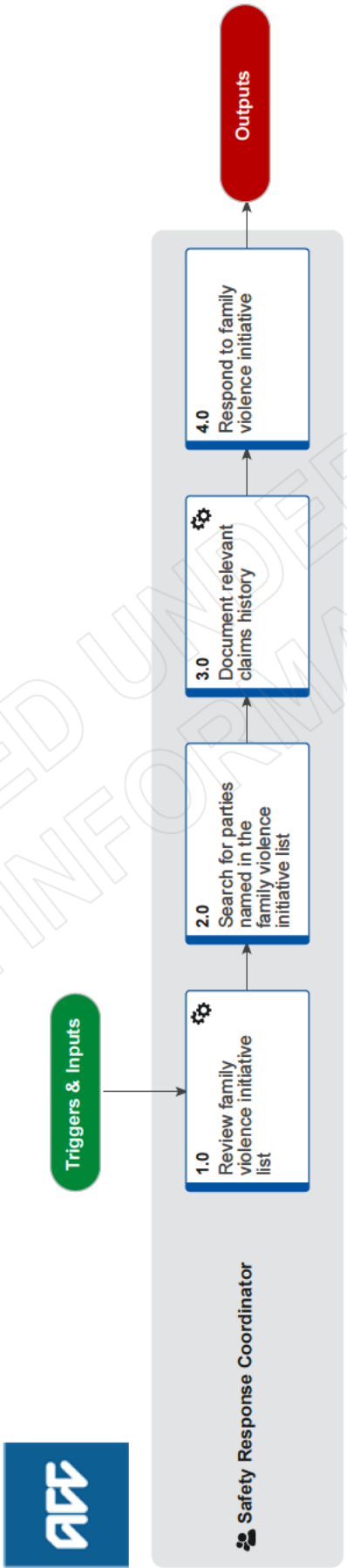
 **PROCESS** Complete Client Information Requests



# Respond to Family Violence Initiative Information Request v5.0



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## Summary

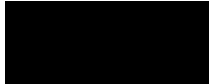
### Objective

To share relevant ACC claim information in a timely and consistent way to support risk assessment and safety planning that is carried out by the family violence initiatives.

### Background

ACC is a named family violence agency (under the Family Violence Act 2018) and is committed to reducing family violence and sexual violence. We receive lists from family violence initiatives which contain the names of people involved in an episode of reported family violence (victim, perpetrator, mutual participants, witness, CYP (child or young person) at risk). These lists are deemed a request for ACC to share relevant information to support risk assessment and safety planning that is carried out by the family violence initiatives, with information able to be shared under the Family Violence Act 2018.

### Owner



### Expert

## Procedure

### 1.0 Review family violence initiative list

#### Safety Response Coordinator

- a In Outlook, open family violence initiative (FVI) list from Safety Response Team shared inbox and filter list for 'high' and 'moderate' episodes (and 'low' for Taupō).
- b In InFact, open ISR Client Look up to review relevant claims history information.

#### NOTE Quick Steps

InFact>Dashboards>My Toolkit>ISR Client Lookup



### 2.0 Search for parties named in the family violence initiative list

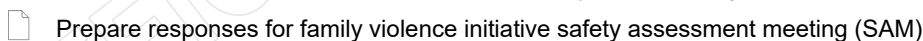
#### Safety Response Coordinator

- a In ISR Client Lookup search for the victim, perpetrator and/or mutual participants for each episode.
- b Review claims history provided and complete a relevancy assessment of the information, concentrating on the past five years for adults and full history for children and young people.

### 3.0 Document relevant claims history

#### Safety Response Coordinator

- a In Outlook open new email addressed to the relevant FVI, change the 'From' field in the email to the shared email address (safety.response@acc.co.nz)
- b Create the email, refer to 'Information provision to daily SAM tables guide'



#### NOTE What do you include in the email?

- Date the last claim was lodged.
- If relevant to family violence, the accident description and diagnosed injuries from the last physical injury claim if lodged within the last 1 year - if not relevant, provide the date only.
- Note if the individual has an active claim without indicating if this is a physical or sensitive claim – “Has an active claim” .
- Accident descriptions for relevant claims – such as claims related to violence, assault, self-harm, head injuries, for each participant involved in episode.

- c Repeat process for each episode.

### 4.0 Respond to family violence initiative

#### Safety Response Coordinator

- a Send email to relevant family violence initiative.
- b Complete privacy check from Outbox making sure correct family violence initiative email address has been used.
- c Release emails from Outbox.

# Summary of the Health Information Privacy Code Policy v11.0



## Summary

### Objective

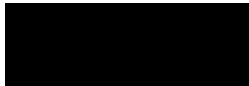
The Health Information Privacy Code 2020 (the Code) applies specific rules to organisations acting as health agencies to ensure that individual privacy is protected. The Code contains 13 Health Information Privacy Rules and works in conjunction with the Privacy Act 2020. It recognises that health information is special and needs to be treated differently as it:

- is considered confidential
- can be sensitive
- may have ongoing use.

With regard to the collection, use, storage and disclosure of health information the 13 Health Information Privacy Rules take the place of the 13 Information Privacy Principles of the Privacy Act 2020 and describe how the code is put into practice.

As of 1 December 2020, the new Privacy Act will come into effect. Please contact us if this page has not been updated by December 2020.

Owner



Expert

## Policy

### 1.0 Rules

- a** You must handle health information in particular ways.

You must make sure you know, understand and comply with the health information privacy rules as there may be financial or other consequences for breaching them.

Complaints regarding breaches of these rules can be made to the Office of the Privacy Commissioner and, if necessary, to the Human Rights Review Tribunal.

### 2.0 The 13 Health Information Privacy Rules in brief

- a**
1. Only collect health information if you really need it
  2. Get it straight from the people concerned
  3. Tell them what you're going to do with it
  4. Be considerate when you're collecting it
  5. Take care of it once you've got it
  6. People can see their health information if they want to
  7. They can correct it if it's wrong
  8. Make sure health information is correct, up-to-date, complete, relevant, and not misleading, before you use it
  9. Get rid of it when you're done with it
  10. Use it for the purpose you got it
  11. Only disclose it if you have a good reason
  12. Only disclose it overseas if the recipient is subject to NZ's privacy law or a comparable overseas law.
  13. Only assign unique identifiers where permitted.

For a full description of these rules, see Complete health information privacy rules.



Complete health information privacy rules

<https://www.privacy.org.nz/assets/Codes-of-Practice-2020/Health-Information-Privacy-Code-2020-website-version.pdf>