Conduct Claims Access Monitoring Check [Historical] v0.60

Triggers & Inputs

Outputs

Technical Manager

1.0
Select teams ready for Access Monitoring Check

Workforce Planner

2.0
Notify team that they have been selected for an Access Monitoring

Team Leader

3.0
Prepare for Access Monitoring Check

4.0
Perform Access Monitoring Check

ACC > Risk Management > Risk and Control Processes > Conduct Claims Access Monitoring Check
Uncontrolled Copy Only : Version 0.60 : Last Edited Tuesday, November 1, 2022 4:16 PM : Printed Wednesday, 7 December 2022 2:34 PM

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Conduct Claims Access Monitoring Check [Historical] v0.60

Summary

Objective
Perform an Access Monitoring Check as part of ACC's commitment to ensuring client personal information is only accessed for appropriate reasons.

Background
We consider ourselves to be kaitiaki (guardians) of any personal information we receive. It is our responsibility to treat personal information as a taonga – to care for and use it only for its intended purposes. Respecting the personal information and privacy of ACC's clients, staff, and stakeholders is a core value and behaviour required of all ACC people.

To ensure we meet these responsibilities for our clients, we regularly monitor how our people are accessing client's personal information through our claims management systems. This will provide assurance that staff behaviour in managing personal information is meeting our high expectations and any instances of concern are followed up on.

Owner   Out of scope

Expert   Out of scope

Procedure

1.0 Select teams ready for Access Monitoring Check
Technical Manager

a In Team Selection tool, refresh data to confirm six team names for access check.

> **NOTE** **Teams are selected at least two weeks prior to the beginning of the month during which the checks are to be performed.**

> **NOTE** **What if Workforce Planning determine that capacity issues require a reduction in teams selected for a month?**
> In these scenarios Workforce Planning can reduce selection down to a minimum of four teams.

b Notify the relevant Workforce Planner to notify the selected team/s.

2.0 Notify team that they have been selected for an Access Monitoring Check
Workforce Planner

a Copy the Access Monitoring Notification into the Workplan.

📄 Access Monitoring Notification

b Send to the selected teams that will need to perform Access Monitoring Checks.

> **NOTE** **How are selected Teams notified?**
> Access Monitoring Check notifications are delivered to teams via their preferred method of delivering workplans and updates to teams.
> This may vary across different functions.

> **NOTE** **How far in advance do selected teams need to be notified?**
> Teams must be notified two weeks prior to the beginning of month in which they are required to perform the checks.

3.0 Prepare for Access Monitoring Check
Team Leader

a Review the Client Information Access Review Tool to ensure it includes all team members in the team, and that their access information is recorded in the tool.

📄 Client Information Access Review Tool

📄 Leader Instructions for Access Monitoring Tools

> **NOTE** **What if you have a team member who does not have any access information in the Client Information Access Review Tool?**
> These team members can be excluded from the checks.

b Schedule a suitable time with each team member to complete the Access Monitoring Check together.

> **NOTE** **Can you use an existing coaching time?**
> You may want to complete the check as part of existing coaching conversations you have in place with your staff member (ie CXQ conversation).

NOTE **How long do you need to perform the checks?**

The checks should take appropriately 15 minutes to complete per team member but could take longer depending on the quantity and complexity of access information to review.

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4.0 Perform Access Monitoring Check
Team Leader

a Meet with your team member at the scheduled time.

b Talk your team member through the objective and process of the Access Monitoring Check.

c Review and discuss the information presented for each claim in the Client Information Access Review Tool with your team member, assessing them against the Access Monitoring Criteria.

📄 Access Monitoring Criteria

NOTE **What if there are multiple actions on a claim within a session?**

Review all activity as a collective set of actions leading to an outcome. The question needing to be answered in these situations was whether the access to the claim was a for valid reason.

NOTE **What if a claim has been accessed in more than one session during the time period captured in the Access Report?**

Complete a separate check for each session.

d Record the findings of each claim access using the Client Information Access Validation Tool.

📄 Client Information Access Validation Tool

📄 Leader Instructions for Access Monitoring Tools

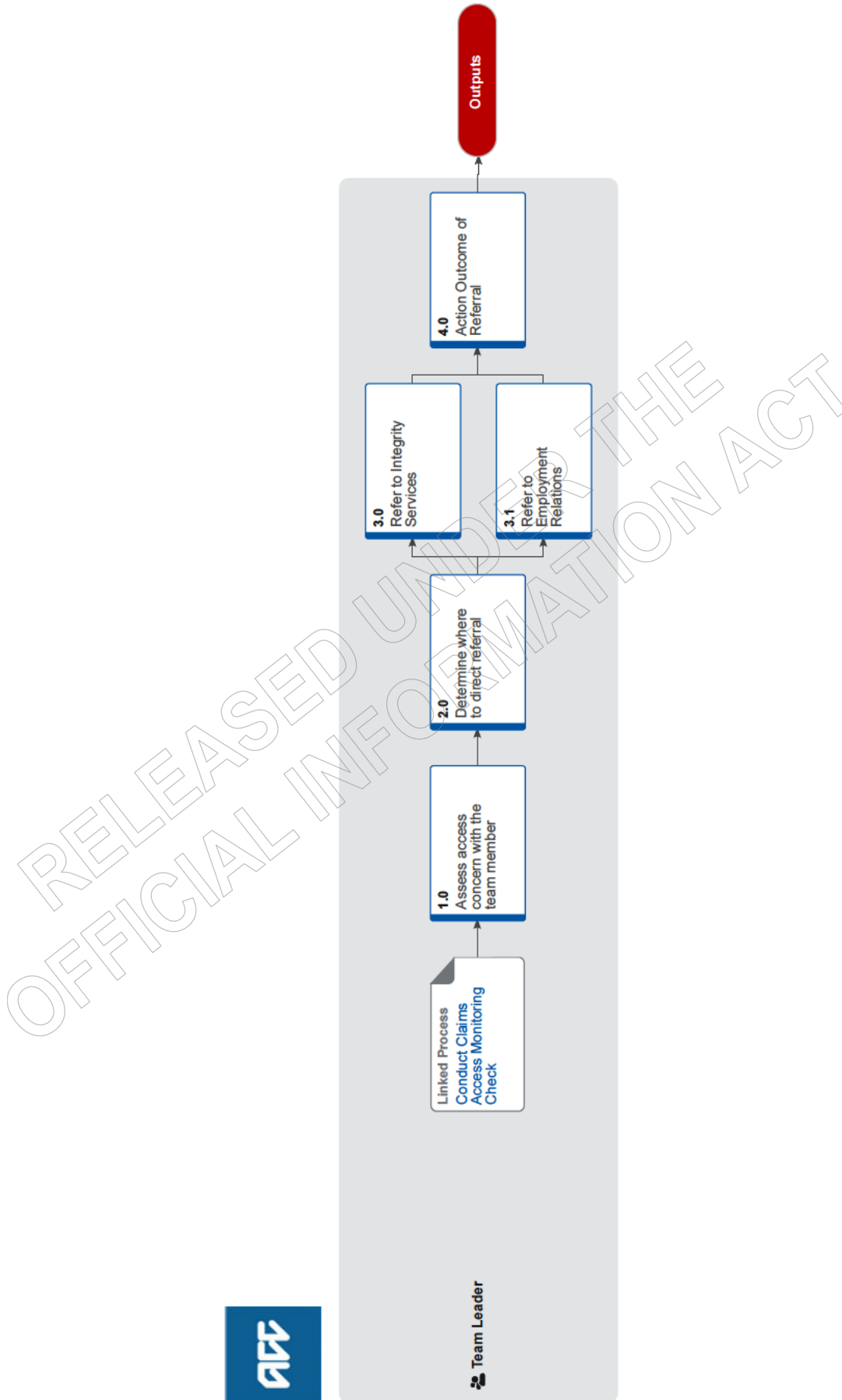**NOTE** **What if a check has resulted in a Low Assurance rating?**

This does not mean that access to the claim was inappropriate, just that we cannot provide clear evidence backing up a valid business reason for access using our current systems and tools. Depending on the reason for assigning a Low Assurance rating you may also want to take additional steps or actions to work with the Team Member to fill knowledge gaps or reinforce best practice behaviors.

NOTE **What if you have concerns about access to a claim?**

This does not automatically mean that access to the claim was inappropriate, but that the access is currently unexplained and requires further validation due to a concern raised during the check. Proceed to 'Assess Claims Access Concerns'

📄 **PROCESS** Assess Claims Access Concerns

- -

ACC > Risk Management > Risk and Control Processes > Conduct Claims Access Monitoring Check
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Assess Claims Access Concerns [Historical] v0.50

Team Leader

Linked Process
Conduct Claims Access Monitoring Check

1.0 Assess access concern with the team member

2.0 Determine where to direct referral

3.0 Refer to Integrity Services

3.1 Refer to Employment Relations

4.0 Action Outcome of Referral

Outputs

ACC > Risk Management > Risk and Control Processes > Assess Claims Access Concerns
Uncontrolled Copy Only : Version 0.50 : Last Edited Tuesday, November 1, 2022 4:15 PM : Printed Sunday, 11 December 2022 8:46 PM

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Assess Claims Access Concerns [Historical] v0.50

Procedure

⬏ PROCESS   **Conduct Claims Access Monitoring Check**
Team Leader

1.0 Assess access concern with the team member
Team Leader

a Ask the team member to explain why they accessed the claim in an instance where you have identified a concern.

> **NOTE**   **How should you ask the team member to explain their reasons for access?**
> The purpose of this conversation is to understand the staff members version of events.
>
> This must be asked in a non-confrontational and non-judgmental way, and should be an exploratory conversation in nature. There are many valid reasons why a team member may have accessed a claim, even if it cannot be evidenced with the systems and processes in place.

b Capture your findings in the Client Information Access Validation Tool.

> 📄   Client Information Access Validation Tool
>
> 📄   Leader Instructions for Access Monitoring Tools

c Determine if the reasons provided by the team member are valid or not.

> **NOTE**   **How do you make this determination?**
> Refer to Claims Access Criteria.
>
> You must also exercise your judgement if the reasons provided are valid or not valid or you have ongoing concerns about the reasons for access.
>
> As a Team Leader who has high visibility of the workloads, work types, relevant processes, experience, expertise, and other attributes of the team environment, you must make a reasonable and fair assessment based on the explanation provided by the staff member, taking into account the factors listed above or any other evidence that is available.

> 📄   Access Monitoring Criteria

> **NOTE**   **What if you decide that the reasons provided are valid and so a referral is not required?**
> You may also want to take action to address knowledge gaps or reinforce best practice.
>
> This process ends.

> **NOTE**   **What additional kinds of information could be used to help make a determination?**
> • Access to Integrity Services advice and guidance to enable additional self-powered validation.
> • Access to peer reviews by suitably qualified practitioners to verify the reasons
> • Request additional footprint reporting to establish a wider data set that may be indicative of access trends.
> • Benchmarking against similar roles or functions to establish normalised access behaviour.

2.0 Determine where to direct referral
Team Leader

a Discuss your findings with your Line Manager and together and confirm that a referral is required.

> **NOTE**   **What if you decide that the reasons provided are valid and so a referral is not required?**
> You may also want to take action to address knowledge gaps or reinforce best practice.
>
> This process ends.

b Determine whether the referral should be directed to Integrity Services or to Employment Relations.

> **NOTE** **When should you direct the referral to Integrity Services?**
> A referral should be made to Integrity Services where the access concern identified requires additional specialised assessment.

> **NOTE** **When should you direct the referral to Employment Relations?**
> A referral should be made direct to Employment Relations only in situations where there is clear evidence of deliberate inappropriate access by the team member, or where the team member has made a direct admission of deliberate inappropriate access.

3.0 Refer to Integrity Services
Team Leader

a Draft a referral email to Integrity Services using the subject heading 'Access Monitoring IS Support'.

> **NOTE** **What information do you need to include in the referral email?**
> • The team members name and role
> • Access points that cause concern
> • Details of additional validation steps completed and the results
> • Why concerns persist
> • Any conflicting or unusual explanations for the access
> • Details of discussion held with you Line Manager, including rationale for referral.

b Send the referral to Integrity Services via the email address integrity.insights@acc.co.nz.

3.1 Refer to Employment Relations
Team Leader

a Draft a referral email to HR Help using the subject heading 'ER Support'.

> **NOTE** **What information do you need to include in the referral email?**
> • The team members name and role
> • Access points that cause concern
> • Details of additional validation steps completed and the results
> • Why concerns persist
> • Any conflicting or unusual explanations for the access
> • Details of discussion held with you Line Manager, including rationale for referral.

b Send the referral to Employment Relations via the email address HRHelp@acc.co.nz.
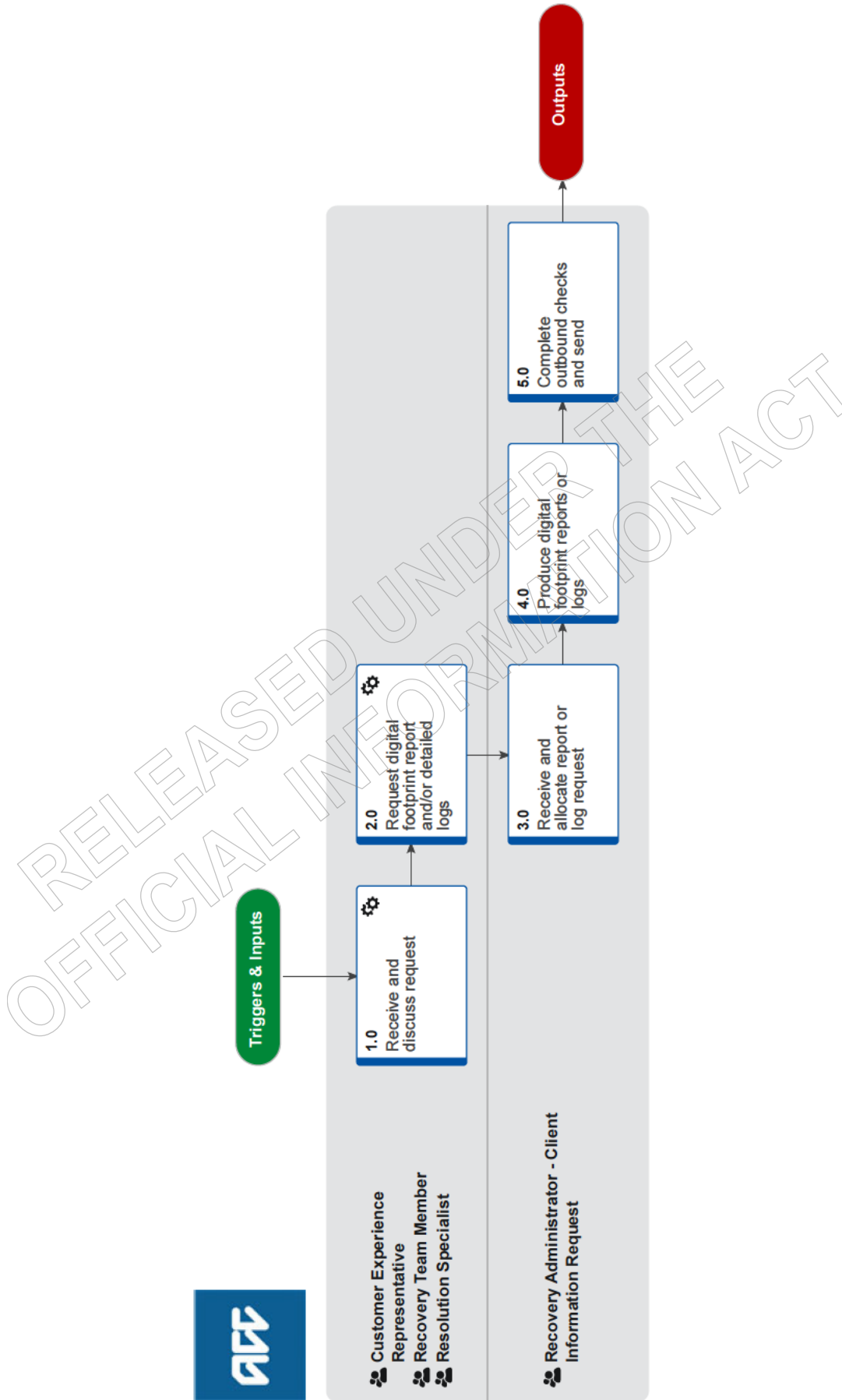

4.0 Action Outcome of Referral
Team Leader

a Receive outcome of the assessment from Integrity Services or Employment Relations.

b Action any activities as required, including changing the Assurance rating assigned in the Client Information Access Validation Tool if instructed.

Complete Digital Footprint Request v9.0

Outputs

Triggers & Inputs

Customer Experience Representative / Recovery Team Member / Resolution Specialist

1.0 Receive and discuss request

2.0 Request digital footprint report and/or detailed logs

Recovery Administrator - Client Information Request

3.0 Receive and allocate report or log request

4.0 Produce digital footprint reports or logs

5.0 Complete outbound checks and send

RELEASED UNDER THE OFFICIAL INFORMATION ACT

ACC > Claims Management > Manage Client Information > Manage Information Requests > Complete Digital Footprint Request
Uncontrolled Copy Only : Version 9.0 : Last Edited Friday, 7 October 2022 4:45 PM : Printed Tuesday, 6 December 2022 1:04 PM

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Complete Digital Footprint Request v9.0

Summary

Objective
To resolve clients concerns about how their personal information has been accessed in ACC systems by providing them with a digital footprint report or access log information in a timely manner.

Background
ACC staff access claim file or party record information when providing services to clients to help them recover from an injury. This access is recorded in the claim system as 'digital footprint' logs, which details what information has been accessed, when and by whom.

When a client wants information about how their claim has been accessed, we can produce a digital footprint report. This report provides an overview of claim access, including the total amount of access for the life of the claim, the number of individual staff who have accessed the claim, as well as a breakdown of access by staff role, staff location, by month/year, and the type of information accessed (eg task, contact, document).

After reviewing the digital footprint report, a client may sometimes require more detailed access information to address a specific concern. In these situations, we can search for the specific access log information the client requires, and if the information is recorded in our systems, download the logs, and send them to the client.

Claim access details is personal information about our clients and is readily retrievable by ACC, so people have a right to request this information from us under the Privacy Act 2020.

Owner   Out of scope

Expert   Out of scope

Procedure

1.0   Receive and discuss request
Customer Experience Representative, Recovery Team Member, Resolution Specialist

a Determine that the request is for information about how their claim has been accessed by ACC staff.

> **NOTE** **This may be requested using different terminology such as access report, digital footprint, or simply as a request for a record of who has accessed their claim file.**

> **NOTE** **What if the task is regarding a Remote Claims Unit client?**
> Send the request to the RCU (RCUclaims@acc.co.nz).
>
> The RCU will manage all contact with the client. If a client requires digital footprint information they will be provided with the logs for the period of concern without staff names or locations. The task to produce the logs will clearly state 'RCU' and the information will be sent following the RCU dispatch procedures.

b Ask the client for their reasons for making the request to help understand what information they require.

> **NOTE** **What if the client is concerned about an individual staff member accessing their information outside of what would be expected in their role?**
> Concerns of this nature (eg where the client has a personal connection with the staff member) need to be resolved by the Customer Resolution Team.
>
> Transfer the call to 0800 650 222 or create a 'Call back request' task outlining the details of the concern and allocate it to the 'Customerresolution' queue.
>
> The Resolution Specialist will view the client's claim access information by reviewing the information in the Digital Footprint Report Tool or Digital Footprint Logs Tool, and discuss the concern with the client.
>
> If the client requires a copy of their digital footprint report and/or detailed logs, they will request a copy is sent to the client by following step 2.0 below.

c Explain to the client what information is provided in a Digital Footprint Report.

> **NOTE** **What if you have received the request in the Contact Centre?**
> Follow the instructions in The Vault to produce the client's digital footprint report for the claim they are interested in and discuss the access information with the client. If the client requires a copy of the report, or requires specific access log information, continue with the steps in this process.

NOTE   **What information is in a Digital Footprint Report?**
The report provides an overview of staff access to a specific claim. The report will show the number of individual staff who have accessed the claim, as well as the number of claim views:
• in total
• per calendar year
• by staff location
• by staff job title.

The report also provides details of about what parts of the claim have been accessed by staff since the system started recording this information on 29 July 2022 (eg tasks, contacts and documents).

The access details table in the report shows a further breakdown of this access by staff over recent months and previous years.

Please note: Staff Role titles did not lock prior to 29 July 2022. This means the role recorded may reflect the most recent role the team member held when this report was created, rather than the role held at the time the claim was accessed.

For more information see 'Digital Footprint Report Example' and 'Understanding your Digital Footprint Report'

📄   Digital Footprint Report Example

📄   Understanding your digital footprint report

NOTE   **What if the client requires more detailed information about who has accessed their claim and which parts have been accessed?**
You will need to request the detailed access logs related to the period of concern. Ask the client to confirm the specific information they require, including:
• claim number
• access date/period, and/or
• the type of information that may have been accessed.

📄   Digital Footprint Logs Example

NOTE   **What if the client requires a copy of their claim or specific claim documents?**
Go to the Complete Client Information Requests process and follow the instructions for providing the client with the information.

↱ **PROCESS** Complete Client Information Requests

d Explain to the client that the preferred channel for providing the information is by their verified email address.

NOTE   **What if the client would prefer their information to be provided via another method?**
Inform the client that providing the information by other channels will likely take longer than providing it by email. Discuss the options available in the Confirming Requirements for Client Information Requests guideline.

📄   Confirming requirements for client information requests

e Inform the client that we aim to provide the information as quickly as possible, but within the 20-working day timeframe for providing personal information under the Privacy Act 2020.

- -

2.0   Request digital footprint report and/or detailed logs
Customer Experience Representative, Recovery Team Member, Resolution Specialist

a In Eos, create a 'Complete Request for Copy of Clients Information' task and add the digital footprint information requested in the Task Description box.

NOTE   **What must be captured in the task?**
• In description field, state one of the following:
• Digital Footprint Report
• Digital Footprint Logs
• Digital Footprint Report and Logs

• Claim number(s)

• Date request was made

• Method of delivery eg email, mail, USB etc (emailed to a verified email address is the default method)

If detailed logs have been requested, also state:
• the access date/period of interest and/or
• the information that may have been accessed.

b Assign the task to the 'Client Information Request' Eos queue.

- -

3.0 Receive and allocate report or log request
Recovery Administrator - Client Information Request

a In the Client Information Request queue, open the task, review the description, and determine the type of information required.

b Allocate the task to the appropriate team member assigned to this work.

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4.0 Produce digital footprint reports or logs
Recovery Administrator - Client Information Request

a Identify whether the client requires a digital footprint report , digital footprint logs, or both.

b Open the appropriate Digital Footprint (PDF version) Tool.

📄 Digital Footprint Report (PDF Version) Tool
https://app.powerbi.com/groups/d511fa9d-9192-4c4d-a362-c57d031117ec/rdlreports/2c0792a7-e275-4cef-ac1d-9c25db36a

📄 Digital Footprint Logs (PDF Version) Tool
https://app.powerbi.com/groups/d511fa9d-9192-4c4d-a362-c57d031117ec/rdlreports/94e1409d-0307-4ce6-8d14-51abc0c5

📄 Digital Footprint Report Tool
https://app.powerbi.com/groups/d511fa9d-9192-4c4d-a362-c57d031117ec/reports/142bb72b-de93-4eed-bede-e3189010c3

📄 Digital Footprint Logs Tool
https://app.powerbi.com/groups/d511fa9d-9192-4c4d-a362-c57d031117ec/reports/1c209d14-dd2a-425c-96e1-f23a929a4c

c Follow the system steps for the appropriate tool to produce the information based on the client's requirements.

NOTE **What if the request is from a RCU client?**
Digital Footprint Reports should NOT be provided to RCU clients as it includes location information.

RCU clients can be provided with Digital Footprint Logs for the period they are concerned about, however Staff Name and Staff Location are NOT to be included.

NOTE **What if the claim search failed to return any results?**
This means that prior to the current day, the claim has not been accessed within the current year, or the previous two calendar years. However, if the claim has been accessed today to resolve the customers query, a digital footprint report would be available tomorrow (after the daily log data has been refreshed).

📄 Digital Footprint Report (PDF Version) System Steps

📄 Digital Footprint Logs (PDF Version) System Steps

d Save the document into the CIR working folder.

NOTE **What do you name the document?**
Name the document '[claim number][client's name] - digital footprint report' or '[claim number][client's name] - digital footprint logs'

e Upload a copy of the document to the client's claim

- -

5.0 Complete outbound checks and send
Recovery Administrator - Client Information Request

a Check the task to determine how the client would like to receive their report.

b Produce the INP05a Digital Footprint Request - provide info letter and 'Understanding your digital footprint report' guide and collate with the client's digital footprint information.

📄 INP05a Digital Footprint Request - provide info

📄 Understanding your digital footprint report

c Follow the CIR Map to complete the privacy check dispatch procedures and final administration of the task.

NOTE **What if the information is being emailed to the client?**
Ensure the report or log information is password protected and the client is informed.

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Discipline Policy

POLICY NUMBER	2.4.0
TOPIC	Discipline Policy
OWNER	Out of scope Employment Relations Manager Business Partners and Organisational Change team People and Culture Group
DATE APPROVED	14 June 2022
APPROVER	Out of scope Deputy Chief Executive, People and Culture
DATE OF NEXT REVIEW	June 2025

1 Objective

Where conduct concerns arise, ACC's objective is to manage these in a fair and consistent manner, ensuring people get the chance to appropriately participate in the process, provide information and explanations.

2 Scope

This policy applies to all of ACC's employees when performing their duties, representing ACC in any way, or where their conduct has a bearing on their role at ACC.

ACC has developed a [Disciplinary procedure](#) to guide leaders and employees in applying these standards.

3 Policy statement

All ACC employees have a role to play in maintaining our reputation and standing in the public's perception. Our actions and behaviours must be consistent with the standards outlined in the Code of Conduct at all times. Conduct concerns will be managed through fair and reasonable processes. Behaviour or actions that are investigated and found to be misconduct or serious misconduct may result in disciplinary action.

4 Policy standards

This policy supports the [Code of Conduct.](#)

4.1 Allegations of misconduct or serious misconduct will be dealt with in a procedurally fair manner.

4.2 There may be events or situations where an investigation into the employee's conduct is warranted. The potential outcome of such an investigation could include disciplinary action.

4.3 ACC will determine the process for conducting disciplinary investigations on a case-by-case basis. Investigations will be full and fair and compliant with natural justice.

4.4 Employees have the right to request assistance or support from representatives, including their union, at any stage of the disciplinary process.

4.5 Matters of concern will be discussed with employees in a clear and timely manner, giving the employee a reasonable opportunity to explain or respond.

4.6 ACC will genuinely consider any explanation provided by the employee before making any decision or taking any disciplinary action.

4.7 Employees are entitled to all the relevant information that ACC uses to make any decision.

4.8 Support is available to all employees through the [Employee Assistance Programme (EAP).](#)

4.9 The action taken in any case will depend on the circumstances, including the seriousness of the substantiated conduct and could include written warnings or dismissal (with or without notice). Previously issued warnings may be taken into account in determining the appropriate outcome.

4.10 Disciplinary processes are managed confidentially.

4.11 The process and its outcome will generally be recorded in writing, with copies provided to the individual and placed on their personal file.

4.12 Warnings will specify the misconduct so the employee understands what corrective action is needed.

5 Accountabilities

The Deputy Chief Executive People and Culture is responsible for ensuring organisational controls are in place in support of this policy.

6 Roles and Responsibilities

Role	Responsibilities
Employees	• Behave consistently with expected standards, including complying with the Code of Conduct • Raise any concerns you have with meeting these standards with your leader, including any potential breaches of the Code of Conduct • Engage appropriately engage in any disciplinary process.
Leaders and/or investigators	• Follow this policy at all times • Advise employees of their rights, including their right to support and representation • Ensure that expected standards of conduct are clearly communicated to all employees • Provide guidance to employees on how to reach expected standards • Contact the People and Culture Group if you require advice or guidance.
Senior leaders	• Take appropriate steps to manage the workplace while allegations of misconduct are being investigated, if appropriate • Be a consistent point of contact for the leader and employee involved • If employees raise an issue with the disciplinary policy or procedure, ensure this policy and associated procedures are being followed.
People and Culture business group	• Monitor, update and communicate ACC's policy and procedures for managing discipline to ensure these remain relevant, appropriate and effective • Provide advice to leaders and employees on the application of this policy.

7 Monitoring and oversight

Line of assurance	Who	Monitoring and oversight
1st line	Employees and leaders	• Employees and leaders discuss discipline issues as appropriate • Employees familiarise themselves with the Code of Conduct, policies applicable to their work and uphold expected standards • One up leaders or another senior leader ensures that discipline procedures and this policy are followed.
2nd line	Employment Relations team	• The People and Culture group oversees discipline processes, ensuring they are managed in accordance with the standards of this policy • The Employment Relations team monitors all employment relations cases and reports to the Deputy Chief Executive of People and Culture to provide oversight, and ensure fair procedures are followed.
	Employment Relations Manager	• Provides monitoring and oversight of all employment relations cases.
3rd line	Assurance Services	• Provides independence information on the overall reliability of processes and performance • This includes the Assurance Services schedule of continuous assurance activities for People and Culture processes and assessment of our compliance with obligations.

Line of assurance	Who	Monitoring and oversight
4th line	Executive	• The CEO and Deputy Chief Executives have primary responsibility for our strategic objectives and reporting to the Board on the management of these objectives.
5th line	Board	• The ACC Board has overall responsibility for ensuring effective risk management is in place. Reviews and assesses CEO and Chiefs' reporting and management of objectives.

8 Breaches of Policy

Complying with all policies and procedures is an expectation outlined in the Code of Conduct. Behaviour or actions that are investigated and found to be in breach of the Code of Conduct may result in disciplinary action, up to and including dismissal. Refer to the Code of Conduct for further information.

9 Contacts

Contact HR Help for any information regarding this policy.
HR Help

10 Definitions

See the Code of Conduct for definitions of misconduct and serious misconduct.

11 References

Code of Conduct

Leaving ACC policy

Performance Improvement policy

Disciplinary procedure

Employment Relations Act 2000

12 Version control

Version	Date	Change reason	Who
1.0	21.12.17	Updated existing policy into new template	Out of scope
2.0	23.08.18	Slight changes following feedback from Out of scope	Out of scope
3.0	19.09.18	Changes following feedback from the working group	Out of scope
4.0	20.09.18	Added monitoring and oversight section. Added responsibilities for senior managers and Talent. Reworded policy statement. Included right to EAP support as a standard.	Out of scope
5.0	25.09.18	Updated to Disciplinary policy, removing dismissal and adding Investigator to responsibilities.	Out of scope
6.0	28.09.18	Updated following working group	Out of scope
7.0	03.09.18	Added 4.9 Disciplinary processes are managed confidentially	Out of scope
8.0	04.03.22	Reviewed as part of review cycle and updated to reflect change in owner and following consultation with Risk and Compliance Policy working group. Disciplinary procedure updated.	Out of scope Out of scope Out of scope
8.0	14.06.22	Approved by Out of scope Deputy Chief Executive, People and Culture	