Inbound and Outbound Document Checks

Supporting Information

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Background / Guiding Principles

The overarching principle for any document checks is that it is everyone's responsibility to ensure the correct and relevant information is attached to a claim, and/or released from ACC.

Whilst many of these checks are administrative in nature, they can only be executed when clear and thorough instruction is provided by the Recovery Team member. Both parties play an important role in ensuring inbound and outbound checks do not result in privacy breaches.

Redaction

For the following, "redaction" means to black-out information from a document using Adobe Pro, or to remove completely (e.g. by physically removing a document).

Recovery Teams should email redaction instructions to Recovery Administration.

Withholding

The term "withholding" applies to instances where the client or representative has requested personal information under Information Privacy Principle 6. Under Principle 6, agencies are required to provide a reason for why information has been withheld.

Where information is being sent to a provider or other party for assessment purposes, agencies are not legally required to provide withholding reasons.

Please see this page for more information about withholding.

Roles and Responsibilites

The overarching principle for any document checks is that it is everyone's responsibility to ensure the correct and relevant information is attached to a claim, and/or released from ACC.

The table below provides further guidance on the role of each position in document checks:

<table>
<tr><th colspan="2">Check Type</th><th>Recovery Teams</th><th>Recovery Administration</th></tr>
<tr><td rowspan="3">Inbound</td><td>3-point check</td><td>N/A</td><td>Responsible (Inbound Document Management) for ensuring incoming documents are uploaded to the correct client's record</td></tr>
<tr><td>Third-Party</td><td rowspan="2">Responsible for the third-party and relevance checks

Email Recovery Administration to undertake any redactions

When emailing Recovery Administration, they should provide clear instruction on the information that needs to be redacted</td><td rowspan="2">Responsible for redacting based on instruction of the Recovery Team members

Should seek clarification from the Recovery Team if insufficient instructions received</td></tr>
<tr><td>Relevance</td></tr>
<tr><td rowspan="4">Outbound</td><td>Third Party</td><td rowspan="3">Responsible for the third-party and relevance checks

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<tr><td>Other Party</td></tr>
<tr><td>Dispatch/House keeping</td><td colspan="2">It is the responsibility of all team members to ensure outbound documentation is sent to the correct recipient and meets quality standards</td></tr>
</table>

Example One – Sending an Initial Medical Assessment referral

<table>
<tr><th>Who</th><th>Action</th></tr>
<tr><td rowspan="3">Recovery Team member</td><td>Compiles document group</td></tr>
<tr><td>Completes third-party and relevance checks - identifies third-party information in a Stay at Work report</td></tr>
<tr><td>Sends a redaction email to Recovery Administration and provides instructions, e.g.
"Document group – Medical Documents; Document type – ACC7430 Stay at Work – plan progress and completion; please remove third party information on page xx"</td></tr>
<tr><td rowspan="2">Recovery Administration</td><td>Uses Adobe Pro to redact third party name from all pages and re-uploads document</td></tr>
<tr><td>Completes housekeeping and dispatch check</td></tr>
</table>

	Sends referral

A Recovery Team or Recovery Administration TL will need to remove the original document

Example Two – Sending an Orthopaedic Medical Case Review

Who	Action
Recovery Team member	Compiles document group for referral
	Completes third-party and relevance checks – notes that GP notes contain references to historical sexual abuse
	Sends a redaction email to Administration and provides instructions, e.g. *“Document group – Medical Documents; Document type – Medical Reports/Notes; please remove non-claim related information on page xx”*
Recovery Administration	Uses Adobe Pro to redact references to sexual abuse and re-uploads document
	Completes housekeeping and dispatch check
	Sends referral
A Recovery Team or Recovery Administration TL will need to remove the original document	

Example Three – Processing inbound GP notes

Who	Action
Recovery Administration	Completes 3-point check and uploads documents
	Sends *You have new mail* task to Recovery Team
Recovery Team member	Completes third-party and relevance checks – identifies that GP notes contain references to the client’s husband who is having treatment for testicular cancer
	Sends redaction email to Administration and provides instructions, e.g. *“Medical Reports/Notes uploaded on 18 February 2020 @ 9.28; please remove third party information on page xx”*
Recovery Administration	Uses Adobe Pro to redact information about client’s husband and reuploads document
A Recovery Team or Recovery Administration TL will need to remove the original document	

Inbound Checks

Types of inbound check

Inbound Document Management are often the first point in the inbound checking process and are responsible for an initial 3-point check. This ensures that information is uploaded to the correct file. Due to the superficial nature of the 3-point check, it remains the responsibility of the Recovery Team members to check any uploaded documentation for third-party or irrelevant information and ensure it is redacted.

Recovery Teams should task redaction to Administration.

3-point

Purpose	Accountable roles
Ensure incoming documents are uploaded to the correct client's record	Inbound Document Management Team

Examples of 3-point check

Information	Action
Medical notes from provider contain 3 data points – client name/address, date of birth and claim number - that match with the client's Eos record	Upload the documents
Unable to match 3-data points in medical notes from provider	Investigate further. Look for other data points that might match, e.g. the provider involved, the injury type, a signature. Call the provider. If still unable to match, discuss with TL

Third-party

Purpose	Accountable roles
To ensure that no personally identifiable third-party information is on the document that has been uploaded to the claim	Recovery Teams This would normally be the person who receives the *You have new mail* task from the Inbound Document Management Team

Examples of third-party check

Information	Action
GP notes contain another patient's medical certificate	Email Recovery Administration to remove, redact and re-upload (put in document description that unrelated information was removed on receipt). A Recovery or Administration TL will need to remove original document
GP notes contain other individuals' random claim numbers or ACCID numbers	Email Recovery Administration to remove, redact and re-upload (put in document description that unrelated information was removed on receipt). A Recovery or Administration TL will need to remove original document

ACC requests an Independence Allowance assessment report – there is a section that relates to another client	Send the report back to author and ask them to submit an amended report

Relevance Check

Purpose	Accountable roles
To ensure that only information relevant is uploaded to the claim	Recovery Teams

Examples of relevancy check

Information	Action
Client has an Anterior Cruciate Ligament (knee) injury – a DHB assessment outlines the details of a historic sensitive claims event	Where it is *clearly* irrelevant, email Recovery Administration to remove, redact and re-upload (put in document description that unrelated information was removed on receipt). TL will need to remove original document
Client has a claim for a broken leg – medical notes contain cervical smear test results	Where it is *clearly* irrelevant, email Recovery Administration to remove, redact and re-upload (put in document description that unrelated information was removed on receipt). TL will need to remove original document
Client has a thoracic injury and ACC requests an orthopaedic assessment – the report contains references to bi-lateral knee replacement	Refer the report back to author to determine relevance

Outbound Checks

Whilst many of these checks are administrative in nature, they can only be executed when clear and thorough instruction has been provided by the Recovery Team member. Both Recovery Administration and the Recovery Teams play an important role in ensuring outbound checks do not result in privacy breaches.

It is always important to consider the recipient of the information when undertaking an outbound check and as this has a bearing on the type of action taken.

Information that is not relevant for a provider (e.g. for an assessment referral pack) is not 'withheld', it is simply not provided. In these cases there is no need to use withholding grounds from the Privacy Act to justify why we have redacted something. However, when a client requests their own information, we need to tell them why we have withheld any information.

Third-Party

Purpose	Accountable roles
To ensure that no personally identifiable third-party information is included in the document being sent	Recovery Teams and Recovery Administration

Examples of relevance check

Information	Sending to provider	Sending to client
Provider home addresses	Redact – no need to provide a withholding reason	Withhold under s29(1)(a) of Privacy Act 1993 and redact
Identifiable information about other individuals, e.g. a report contains another client's name and claim number in the footer	Redact – no need to provide a withholding reason NB. Where the information is on a single page just remove	Withhold under s29(1)(a) and redact. **Please note: This will also need to be removed permanently from the claim. Recovery or Administration TL removes original document - the redacted version must re-uploaded** NB. Where the information is on a single page just remove
Other individuals' random claim numbers or ACCID numbers	Redact – no need to provide a withholding reason	Withhold under s29(1)(a) and redact. **This will also need to be removed permanently from the claim as above**
Other individuals' identifiers, e.g. Drivers' Licence numbers, IRD numbers	Redact – no need to provide a withholding reason	Withhold under s29(1)(a) and redact. **This will also need to be removed permanently from the claim as above**
Information about client's family members, e.g. Oranga Tamariki notes about a family conference	Consider if it's applicable to release in context, otherwise redact – no need to provide withholding reason	Consider whether it is applicable to release in context, otherwise withhold under s29(1)(a) and redact
Next of kin information	Redact – no need to provide a withholding reason	Leave in

Relevance check

Purpose	Accountable roles
To ensure that only information relevant to the claim is sent *Determining relevance can be difficult to do, however, if it feels wrong, it probably is*	Recovery Teams and Recovery Administration

Examples of relevance check

Information	Sending to provider	Sending to client
Client has a rotator cuff (shoulder) injury - clinical notes mention PTSD	If clearly not relevant, redact – no need to provide a withholding reason	Leave in Good practice would be to permanently remove this from the file
Client has a Treatment Injury for a hernia - GP notes contain references to asthma, eczema and diabetes	If clearly not relevant, redact – no need to provide a withholding reason	Leave in Good practice would be to permanently remove this from the file
Client has an Anterior Cruciate Ligament (knee) injury – a DHB assessment outlines the details of a historic sensitive claims event	If clearly not relevant, redact – no need to provide a withholding reason	Leave in Good practice would be to permanently remove this from the file
Client has a concussion injury – clinical notes refer to a torn ankle ligament injury	If clearly not relevant, redact – no need to provide a withholding reason	Leave in Good practice would be to permanently remove this from the file

Other Party Check

Purpose	Accountable roles
To check for any other relevant withholding reasons (Sections 27-30 of the Privacy Act). Ensure that information being released does not breach legal privilege, is not likely to prejudice the maintenance of the law, is not likely to endanger the safety of an individual, etc	Recovery Teams and Recovery Administration

Examples of other party check

Information	Sending to provider	Sending to client
Legally Privileged, e.g. emails between a case owner and ACC's Legal Services about whether to do a s103 assessment (may be able to return to pre-injury role)	Redact – no need to provide a withholding reason	Withhold under s29(1)(f) and redact; leave in EOS file
Non-core pricing, e.g. hospital notes contain a breakdown of elective surgery costs	Redact – no need to provide a withholding reason	Withhold under s28(1)(b) and redact; leave in EOS file
Fraud informant information, e.g. file note indicating that client's neighbour called the Fraud Line to allege client has been driving a delivery van	Redact – no need to provide a withholding reason	Withhold under s27(1)(d) and redact; leave in EOS file
Fraud investigation techniques, e.g. a memorandum explains how a surveillance activity was carried out	Redact – no need to provide a withholding reason	Withhold under s27(1)(d) and redact; leave in EOS file
Delicate health information which could emotionally disturb client, e.g. client has a history of suicidal ideation and a psychiatric report indicates that the client is malingering	Leave in if relevant	Withhold under 29(1)(c) - after consultation with individual's medical practitioner - and redact; leave in Eos file

Dispatch Check

Purpose	Accountable roles
To ensure that documents are being sent for one client only and sent to the correct recipient	Recovery Teams and Recovery Administration

Examples of dispatch check

Information	Action
Purchase order extension letter being emailed to a provider. A second document for another party is identified during the Smart Gate check	Remove incorrect document. Establish how error occurred. Advise TL if recurring multiple times from same person (for learning opportunities)
Vocational Independence letter being posted to client. During a buddy check, a second letter located in envelope	Remove incorrect document. Establish how error occurred. Advise TL if recurring multiple times from same person (for learning opportunities)
Request for medical notes being requested from Auckland DHB. During Smart Gate check, it is found that the email address is for Capital and Coast	Change email address. Establish how error occurred. Advise TL if recurring multiple times from same person (for learning opportunities)

Housekeeping Check

Purpose	Accountable roles
To ensure outbound documentation meets quality standards	Recovery Teams and Recovery Administration

Examples of housekeeping check

Information	Action
Letter is not signed	Fix and sign letter (to prevent delays in information getting sent)
Letter is not on letterhead	Fix letter (to prevent delays in information getting sent)
Fields in form not populated	Fix or return to tasker – advise TL if recurring multiple times from same person (for learning opportunities)
Email contains misspellings or poor grammar	Fix or return to tasker – advise TL if recurring multiple times from same person (for learning opportunities)