

1 July 2024

Joe

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Kia ora Joe

**Your Official Information Act request, reference: GOV-032857**

Thank you for your request of 4 June 2024, asking for the following information under the Official Information Act 1982 (the Act):

*I request clarification to your response GOV-029712.*

*I request the following:*

- 1. In which of ACC's databases the information on claimant email redirection is held at ACC, which allowed Jason Hope to provide very specific numbers of email addresses that are being subjected to email redirection.*
- 2. ACC's documents that describe*
  - (a) the meaning of "email redirection",*
  - (b) how the email redirection is to be implemented, and*
  - (c) the approval process for the email redirection.*
- 3. ACC's methodology to determine the ownership of email addresses not linked to a claimant in EOS. (How was ACC able to verify the email address belonged to the claimant and not to the claimant's family, friends, advocate, or other representative?)*
- 4. A copy of ACC's notice to claimants and non-claimants which clearly describes the implementation of the email redirection and the effect of that email redirection.*
- 5. For each year from 01/01/2014 to present, I request:*
  - 1. The number of claimants and non-claimants whose email communications were subjected to redirection, and please specify the numbers into categories of*
    - (a) claimant,*
    - (b) claimant's family, friend, advocate, or other representative; and*
    - (c) other person.*
  - 2. The length of time each of the claimants' and non-claimants' email communications were subjected to redirection.*
  - 3: For each claimant and non-claimant email address subjected to redirection, please specify whether this email redirection was implemented as a "communication plan" or not.*
  - 4: For each claimant and non-claimant email address subjected to redirection, please specify whether the email redirection was implemented with the assistance of Datacom or other IT support (please specify the company or agency who provided the IT support).*
  - 5: For each claimant and non-claimant email address subjected to redirection, please specify whether the email redirection:*
    - (a) occurred during transit, that is at the Datacom or ACC server, and before reaching the intended*

*recipient, or  
(b) occurred after the intended recipient opened and read the communication, which is email forwarding.*

## **Our response**

### *Question 1*

The list of emails with email redirection rules is held within the Active Directory Database managed by the Information Security team.

### *Question 2*

Our process documents do not specifically mention email redirection. As such, we are refusing this request under section 18(e) as the information does not exist. However, email redirections for clients usually relate to care indicators or are implemented as part of a communication plan, as a type of communication restriction. Restrictions may be used when the behaviour or communication from a person, because of its nature or frequency, raises substantial health, safety, resource, or equity issues.

This is based on Ombudsman guidance. Please refer to chapter 18, at page 99 about modifying or restricting access of 'Managing unreasonable complainant conduct', here:

[www.ombudsman.parliament.nz/sites/default/files/2019-03/managing\\_unreasonable\\_complainant\\_conduct\\_manual\\_october\\_2012.pdf](http://www.ombudsman.parliament.nz/sites/default/files/2019-03/managing_unreasonable_complainant_conduct_manual_october_2012.pdf)

### *Question 3*

To determine how many emails with redirection rules were linked to a client, we searched the emails in our system, EOS, to check whether they were linked to a client's EOS profile. The client's EOS profile also shows some emails that were previously used by the client but are no longer their main email address. Emails linked on EOS profiles are all verified, where the client is asked to confirm their identity. A small number of emails were also concluded as belonging to clients due to their use in previous correspondence.

### *Question 4*

Please find attached the three templates that are used to implement a communication plan:

- REV51 Supporting Effective Communication - Warning 1
- REV52 Supporting Effective Communication - Warning 2
- REV53 Supporting Effective Communication – Restriction

The restriction letter serves as a notification to a client that they have been placed on a communication restriction with ACC. Where applicable, this letter will notify a client that they are limited in who they can contact at ACC, informing them that all correspondence with ACC will be re-directed to one staff member. This section only applies to clients on email re-direction.

### *Question 5*

We are refusing your request for information from 2014 to present, as extracting the data would require substantial collation and research. This decision is made under section 18(f) of the Act. In doing so, we considered extending our timeframe to respond and charging (as allowed under the Act). However, it was determined that the resources required to extract the data would have a significant impact on the everyday functions of the team(s) involved.

**If you have any 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



Christopher Johnston  
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