

31 March 2016

David Lawson
fyi-request-3656-6ecb034c@requests.fyi.org.nz

Dear Mr Lawson

Official Information Act Request

Thank you for your email received 20 February 2016. An extension of time was notified to you on 18 March 2016. A decision letter on 24 March 2016 then advised that information in response to your request would be supplied by 31 March 2016.

Our approach

We have treated this email as a request for information under the Official Information Act 1982 (the Act).

Your requests and our corresponding responses are set out below. Due to similarity in subject matter, some of your requests have been grouped for response. The wording of your specific requests is set out within ACC's response, written in *italics*.

We note that higher level documentation only is provided in certain cases with respect to the material you have sought - such as procedural documents – by way of some of your requests.

Request One

I am following up the receipt of the above mentioned screen shot with a new request under the OIA 1982 that the Accident Compensation Corporation make available to me copies of the screen shots that are generated from an ACC claimant Eos Party Level records on the ACC Party Level system for each of the following information classes that were displayed on the full Documents screen shot from Eos that was supplied to me through FYI on 19/02/16 or on a previous Contact screen that I had been provided.

*Case Map,
General,
Entitlements,
Plan,
Managing,
Contacts,*

Documents, which also show Documents for Claim and also Document Groups Tasks, Injury, Medical, Employment With an arrow tab to the right suggesting further tabs (please clarify what other information classes or information are displayed upon this tabs selection with a copy of a screen shot).

Request Two

I am also following up the receipt of the above mentioned screen shot with a new request under the OIA 1982 that the Accident Compensation Corporation make available to me copies

of the screen shots that are generated from an ACC claimant Eos Claims Level records on the ACC Claim Level system for each of the following information classes that were displayed on the full Documents screen shot from Eos that was supplied to me through FYI on 19/02/16 or on a previous Contact screen that I had been provided.

*Case Map,
General,
Entitlements,
Plan,
Managing,
Contacts,*

Documents, which also show Documents for Claim and also Document Groups Tasks, Injury, Medical, Employment With an arrow tab to the right suggesting further tabs (please clarify what other information classes or information are displayed upon this tabs selection with a copy of a screen shot).

Response to Requests One and Two

We refer to Paul Holmes' letter to you dated 4 March 2016. Screen shots of each tab were provided. The only exception was of Case Map - as the Case Map tab no longer exists. It was removed when Eos was upgraded in November last year.

The process involved to provide you with a screen shot of each page of the documents tab in your file was also explained to you. ACC would have had to carry out an undertaking that would be administratively burdensome, and therefore your request was declined. You were however invited to visit your local branch of ACC - so that you may view your claim file in Eos, should you choose to do so.

The offer to visit your local branch and view your claim file in Eos remains open to you to take up. We reiterate our earlier advice and decline your current requests for screen shots outlined in Requests One and Two.

Request Three

In addition please supply all official information in respect of the training manuals/procedural documentation associated with the use of these Eos Claims and Party Level systems.

Response to Request Three

Attached as Appendix One is a copy of all the higher level training/procedural documentation associated with the use of Eos for dealing with and managing Claims and Party information. We note that providing all of the documents connected to those supplied would be administratively burdensome. Please review and advise us of any specific documents named within the high level documentation of which you require a copy.

Request Four

In addition please supply similar material as requested in 1). 2). and 3). above, that specifically applies to the ACC systems in which the following information is held by ACC in relation to an ACC claimant,;

- i). ACC legal advice and opinion, sought or requested*
- ii). ACC internal and external reviews of a claimants file,*
- iii) Information stored by the ACC Investigation's Unit.*

Response to Request Four

With respect to screen shots, we refer you to our response to Requests One and Two.

In terms of training manuals/procedural documentation, we attach as Appendix Two:

- i) all the higher level documentation in respect of the training manuals/procedural documentation associated with the use of:

- a. ACC legal advice and opinion, sought or requested; and
 - b. ACC internal and external reviews of a claimants file.
- ii) all official documentation in respect of training manuals/procedural documentation associated with ACC information stored by the ACC's Integrity Services (noting that ACC's Integrity Services is different and separate from the Office of the Complaints Investigator).

As per our response to Request Three above, we note that providing all of the documents connected to those supplied would be administratively burdensome. Again, please review and advise us of any specific documents named within the high level documentation of which you require a copy.

Request Five

I also respectfully request that you identify and name the systems and levels that the information in 4). i), ii). and iii). is stored in i.e. claims level and party level, apply to the claims management....is there a legal level, review level and investigation level and if so please clarify the correct and exact ACC terminology in terms of the systems and levels that ACC hold legal, review and investigation information in.

Response to Request Five

There are not separate Eos 'levels' for legal, review and investigation information and material.

Documents and correspondence regarding reviews are stored in Eos along with all other documents and contacts relating to decisions made regarding client cover, treatment, rehabilitation and entitlements.

Certain legal documents are also loaded into Eos by Case Management staff. A difference is they are "secured". This means that these documents cannot automatically be (or inadvertently) printed out when a full copy file is generated. This step simply ensures that a robust process is in place, so that staff check that what they are sending out is not legally privileged.

Legal Services and Integrity Services files are retained separately in folders within Windows.

Request Six

In respect of 4) i), ii). and iii) above please provide all official information on the numerical format of the unique identifiers/ACC specific numbers that would apply to each of the separate categories of information enquired about in 4. i), ii). and iii) above. This information should include the number of numbers and or letters that are used to form the unique identifier.

As an example both claims and complaint numbers both have numeric identifiers of 11 numbers/characters, whilst a client PID (which I assume is an ACC claimants Part Identification number) has 8 characters the first being a letter followed by 7 numbers.

Response to Request Six

Please refer to Appendix Three attached.

Legal Services has an internal document management system which identified matters, either by Court number if litigation is involved, or by an internally generated number if it is not a Court matter (as per Appendix Three – Non-Litigation number).

In circumstances of suspected client fraud, Integrity Services uses the existing claim number for that client.

Request Seven

Please provide all official information on how an ACC claimant can obtain confirmation from ACC as to the exact terminology of the systems and levels the information I have sought in request 5). above is held, and at the same how a claimant can be provided with from ACC confirmation of the claimants own individual unique identifiers as requested in 6). above, that are directly associated with the systems and levels that legal, review and investigation information regarding that claimant held by ACC.

Response to Request Seven

ACC can confirm that an individual, by requesting all their personal information under the Privacy Act 1993, will receive all relevant material unless it is necessary for ACC to withhold particular documents to maintain legal privilege - or other relevant withholding grounds apply.

With respect to unique identifiers that apply or have been applied to an individual, a specific request for these can be made. They should though be provided as part of the copy information supplied following a request for personal information.

Request Eight

Please provide copies of all ACC policy documentation and training manuals that are relied upon and used in response to an ACC Claimant's request for information in respect of legal, review and investigation material held about the claimant by ACC when a client's request for the specific information that has been identified in requests 4). through to 7) is made.

Response to Request Eight

We attach two documents from ACC's website related to personal information – *Requesting personal information* and *Collection and disclosure of information*.

Any request by a client for information regarding them or their claim would usually be treated as a request under the Privacy Act 1993. These requests, in the first instance, should be directed to the ACC staff member who manages the claim. There is no specified format for making these types of requests for personal information.

Principle 6 of the Privacy Act 1993 states where an agency holds personal information in such a way that it can readily be retrieved, the individual concerned shall be entitled to obtain from the agency confirmation of whether or not the agency holds such personal information, and to have access to that information.

The application of this principle is subject to the provisions of Parts 4 (good reasons for refusing access to personal information) and 5 (procedural provisions relating to access to and correction of personal information) of the Privacy Act 1993. Redactions to or withholding of personal information are made in accordance with sections 27 to 29 of the Privacy Act 1993. The reasoning for not releasing must be explained to the requestor. Any assessment with regard to redaction or withholding is done on a case by case basis when reviewing the information relevant to the request.

The Privacy Commissioner's website has further information on making privacy requests at www.privacy.org.nz.

Request Nine

Upon receipt to the claimant of the information detailed in requests 4) through to 7). above, and a client applying to ACC for access to the information held in the systems and levels identified in 4). above, please provide copies of all ACC policy documentation and training manuals that are relied upon and used in response to an ACC Claimant's request for information in respect of legal, review and investigation material held about the claimant by ACC in this instance.

Response to Request Nine

We refer you to our response to Request Eight.

Request Ten

Please provide any and all official information in respect of ACC procedural policy, or other communication, either historical or current that seeks to restrict a claimants access to being provided with the legal, review and investigation information held by ACC that relate to the ACC claimant.

Response to Request Ten

Our response above to Request Eight is again relevant.

As well, ACC's policies and procedures connected to dealing with and managing legal and investigation information and material are not inherent or particular to our own organisation. They are based on approaches used by other agencies. For example, legal privilege is not managed differently here at ACC than it would be in a private organisation; and the necessity to maintain confidentiality during a fraud investigation is the same. Review information is otherwise available as outlined in the material provided to you above.

Questions or concerns about ACC's response

If you have further questions, contact us by email at GovernmentServices@acc.co.nz.

You have the right to make a complaint to the Office of the Ombudsman regarding our response. You can call them on 0800 802 602, 9am to 5pm weekdays, or write to: The Office of the Ombudsman, PO Box 10 152, Wellington 6143.

Yours sincerely

Government Services

Appendix Three

Identifier	Length	Pattern	Example	How are they generated	What they are linked to
Complaint Case Number	The length of the complaint case number is 11	[0-9]{11}	12345678910 [0-9][0-9][0-9][0-9][0-9][0-9][0-9][0-9][0-9][0-9][0-9]	Linear sequence from ACC data base	A complaint lodged with ACC
Feedback Case Number	This is a new case which replaces the complaint case from May 2016 onwards. The length is 14.	[CFB][0-9]{11}	CFB12345678910	Linear sequence from ACC data base	As above
Review Number	The length of the review number is 7. Review numbers were generated from 4000000 and are attributed sequentially.	[0-9]{7}	4123456 [0-9][0-9][0-9][0-9][0-9][0-9][0-9]	Linear sequence from ACC data base	A review of an ACC decision
Non-Litigation request	5 digits	Sequential	18321, 18322, 18323	Linear sequence from ACC data base	Internal document management system for non-court matters