



Aide-mémoire

Date: 24 February 2017 **Security Level:** Confidential

For: Honourable Minister Ngaro, Associate Minister for Children

File Reference: REP/17/2/176

Individual Client Level Data Update

Meeting/visit details 1.45 – 2.30, 27 February 2017, 4.3R, Executive Wing, Parliament Buildings

Purpose of meeting

To provide information to the Minister in relation to Individual Client Level Data collection, the process being used to roll out this requirement, key dates, messaging approach and how are we capturing and storing the data. We will also provide an update on the concerns from the Office of the Privacy Commissioner.

Key points

Individual Client Level Data (ICLD) collection

ICLD includes the following personal information:

| | |
|--------------------------------|--|
| Client demographic information | Name, date of birth, address, gender , ethnicity, iwi and country of birth |
| Dependants | Number of dependants Date of birth of youngest dependant |
| Service detail | Programme/service name, start date and end date, source of referral |

Roll out approach taken

Phase One

From 1 July 2016 the following programmes and services had the ICLD collection requirement included in their contract:

- Family Start
- Social Workers in Schools
- Youth Workers in Secondary Schools
- Multi Agency Support Services in Secondary Schools
- Stand – Intensive Family Wrap Around Service.

On 1 November we extended the ICLD collection requirements to three additional programmes and services as follows:

- Building Financial Capability
 - STAND – Family Therapy
 - Community Finance.
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The phase one data collection, up until 30 June 2017, will be provided to MSD from providers in an identifiable form and MSD will use it in a non-identifiable way for analysis, evaluation, aggregated summary reporting and research purposes.

Phase Two

From 1 July 2017 we are including ICLD collection requirements in our contracts for all remaining programmes and services where there is an individual client.

Key dates

The following key dates to be aware of:

| | |
|--|--------------------|
| Provider letters and information pack | March |
| Staff information | March |
| ICLD workshops x3 – readiness/privacy and ethics | 2 March – 14 March |
| Privacy Impact Assessment | March |
| Phase one data provided to MSD form providers | 10 April |
| Minister Tolley update on initial data information on phase one and progress on phase two | End of April |
| Go live for ICLD collection in all contract where there is a programme or service being provided to an individual client | 1 July |

Messaging

A communications plan is in place and we are currently developing staff, provider and client level information.

Collection and storage processes for data

The ICLD collection and storage process is as follows:

1. The provider enters the data into Family Start Net (FSnet), fills in a spreadsheet or runs a report - whichever of these options has been agreed.
2. The provider then uploads the spreadsheet/report (nothing needs to be done by the provider if they are using FSnet) into the Shared Workspace a secure provider portal developed and run by the Department of Internal Affairs.
3. MSD then check the data structure to ensure it is accurate and extract the information through a secure data pipeline

into a secure data storage space.

- Only approved users are provided access to the data. All approved users must comply with the MSD Code of Ethics and the Privacy Act 1993.

Office of the Privacy Commissioner update

MSD received an inquiry from the Privacy Commissioner on the 17 January 2017 into the collection of Individualised Client Level Data by non-government organisation (NGOs) service providers as a contractual requirement for MSD funding.

The purpose of the inquiry is to investigate whether funding contracts that require service providers pass ICLD to MSD infringes individual privacy.

The inquiry also seeks to identify whether the contractual provisions comply with the information privacy principles, in particular principle 3, which governs the steps the collecting agency takes to ensure that the individual concerned is aware of various matters including the purpose of collection, and principle 4 which requires that personal information not be collected by means that are unfair or unreasonably intrusive.

The Commissioner will also be seeking submissions from the representatives of affected NGOs.

MSD responded to the inquiry on 9 March 2017 and we are expecting a response.

Next steps

Report to Minister Tolley and with a recommendation to share the report with Minister Ngaro due end of April 2017.

9(2)(a) - Privacy of another

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