



Report

Date: 24 June 2016

Security Level: IN CONFIDENCE

To: Hon Anne Tolley, Minister for Social Development

Hon Jo Goodhew, Associate Minister for Social Development

REP/16/6/733

The collection and use of Community Investment client level data

Purpose of the report

- 1 This report outlines what we are able to do now within existing provider consent processes to collect and use client level data from Community Investment service providers, and that we are progressively increasing our ability to utilise the client data.

Recommended actions

It is recommended that you:

- 1 **note** that the Ministry of Social Development (MSD) will be collecting client level data from Community Investment (CI) service providers commencing from 1 July 2016 with 23 percent of CI services by expenditure Yes / No
- 2 **note** that MSD will collect client level data from all the remaining CI service providers by 1 July 2017 Yes / No
- 3 **note** the responsibility will sit with the CI service provider to provide MSD with the specified client level data as part of their contractual obligations to receive funding Yes / No
- 4 **note** that our intention is to use the data to target services
 - in the shorter term we will be able to use the data to target cohorts of people
 - the longer term plan is to be able to target services to identifiable persons from July 2017 Yes / No
- 5 **note** MSD is building the Ministry's information system and processes to safely store client data and support associated analytics processes, and that we plan for this to be in place by 1 September 2016 Yes / No

6 **note** that we will report ^{to} you shortly with details on our progress with getting the IT system solutions in place

Yes / No

7 **note** we will report back to you with:

- an update on the progress in collecting client level data from the remaining CI service providers, by 1 July 2017
- details of the processes required to target services to individuals, including the sharing of identifiable client information across MSD service lines and across agencies

Yes / No

8 **agree** that a copy of this report be forwarded to Hon Amy Adams, Minister of Justice.

Agree / Disagree



Bryan Wilson
Associate Deputy CE
Community Investment

24/6/16

Date

Hon Anne Tolley
Minister for Social Development

Date



Hon Jo Goodhew
Associate Minister for Social Development

29/6/16

Date

We will be collecting client level data from service providers to support a social investment approach

- 2 Social investment is about understanding what makes the most difference to people's lives, and using evidence about what works to improve their lives. A key objective of the Community Investment Strategy (CIS) is to better align funding to those with the highest needs, and to invest in programmes and providers that can best meet those needs.
- 3 We are developing the tools and processes, and identifying data requirements, to ensure data informed social investment decisions can be made and services can be targeted to the needs of cohorts and individuals.
- 4 To apply a social investment approach to the CIS, we need:
 - to collect client level data from service providers
 - IT systems to support data storage and analytics
 - to develop the appropriate mechanisms and processes to allow for sharing and use of client level data within legislation
- 5 To support a social investment approach, we need to know the characteristics of client groups to inform our understanding of their needs, identify the most vulnerable, and then invest in the right mix of services to meet those needs.
- 6 To do this for the CIS, we will use the client data to target services to cohorts with particular needs. We are in a good position in the short term to use the data we collect to target cohorts of people. By July 2017 we intend to have the processes in place to use identifiable data to target services to individuals.

We will begin collecting data for a range of purposes including targeting services to cohorts of people

- 7 CIS service providers already collect client level data, on the basis that it is necessary to provide clients with the service, and obtain client consent for this purpose.
- 8 Following consultation with the Ministry of Justice (MoJ), we believe that MSD can begin collecting client data from CIS providers without implementing new consent processes. Must discuss
- 9 Service providers will share the data with MSD to be used in an anonymised form for analysis and evaluation, and aggregated summary reporting and research, without any new consent processes being put in place.
- 10 We will also be able to input client level data into the Integrated Data Infrastructure where it can be linked with other datasets and used for wider research purposes.
- 11 This is permissible under the provisions of the Privacy Act, which allows us to use client data collected from providers subject to:
 - not being used in a form in which the individual concerned is identified; or
 - being used for statistical or research purposes, and not being published in a form that could reasonably be expected to identify the individual concerned.
- 12 Additionally, by July 2017, the Ministry intends to put in place the appropriate tools and processes to be able to share identifiable client level data across MSD service lines or across agencies for the purpose of targeting any intervention, or provision of service to an identifiable individual. We will report back to you on our progress.

What information will be collected and for what purposes

- 13 Service providers will be required to provide the following client level data to MSD:
 - client demographic information: name, date of birth, primary ethnicity, lwi, gender, geographic area
 - client dependants: names and dates of birth (where appropriate)

- service level information: service name, start date, end date.
- 14 Service providers will also be required to provide the following results management framework client level data to MSD, starting 1 July 2017:
- attendance, pre-course assessment, post-course assessment (where relevant)
 - service results information: change in knowledge, attitude, skills, behaviour and/or circumstances (results based achievement).
- 15 From 1 July 2016, the Ministry's purpose for collecting this information is to:
- build an understanding about the cohorts of people accessing what types of services, and where
 - understand outcomes being achieved for individuals and cohorts of clients
 - evaluate the performance of service providers
 - enable comparisons across service providers, service offerings and with similar cohorts
 - enable effective practice to spread, and foster innovative new solutions through sharing information about results for different client cohorts.
- 16 We are working to clarify the specific data and purposes for use that we need to outline in preparation for using identifiable data from July 2017.

The responsibility will be with the service provider to provide MSD with the specified client level data as part of their contractual obligations to receive funding

Is it in contracts beginning 1 July?

- 17 Previous advice to you stated that the client was required to provide their information or they would not receive a service. Having explored this further, the onus will in fact be on the service provider to provide client data to MSD in order to comply with their contractual obligations.
- 18 To ensure adherence to privacy best practice, MSD will require service providers to notify clients that the client data they are collecting will be shared with MSD to be used in anonymised form for evaluation, aggregated summary reporting and research purposes.
- 19 Providers will need to agree to a clause that sets out contractual obligations to share the client data they collect with the Ministry. We can achieve this with minimal changes to our existing Community Investment (CI) contracts.
- 20 Under the amended or new contract, service providers will be paid for services that they deliver to clients which meet the contract service specifications including the requirement that the client data is provided to the Ministry.

By July 2017, our intention is to have the appropriate processes in place for the Ministry to share identifiable client information

not soon enough

- 21 Moving forward, we want to be able to share client identity information across MSD and other relevant government agencies to support the social investment approach and further support integrated service provision.
- 22 In some situations, this information sharing is taking place under established processes, however in other situations additional or new information sharing processes may be required. Examples of situations include:
- service providers may need to share identifiable data of their clients for the best provision of services to meet the clients need *exactly.*
 - where other agencies are involved in providing an integrated service response to a client, such as integration of first response services for adult victims of sexual violence and follow up recovery services
 - where another MSD service line requires the information to provide an integrated response to a client, such as integration of care-leaver services with work and income support services.

with all that this might be eventual outcome. need to assume

- where it is appropriate to target a service to an identifiable individual.
- 23 The information systems we are developing support an integrated service delivery approach and we will give advice to providers on the type of consent required for sharing identifiable information as appropriate.
- 24 We will consider options to support all of these situations, particularly consent-based information sharing. We will come back to you with advice on options.

We are working with the Ministry of Justice and the Office of the Privacy Commissioner to ensure our processes align with best practice and other cross-sector initiatives

- 25 We are consulting the Office of the Privacy Commissioner to ensure the advice we are providing you, and processes we are following, comply with legislative requirements and best practice.
- 26 We are working across MSD and with MoJ to ensure alignment with relevant legislative reforms and development of information sharing provisions.
- 27 We note that integrated responses to vulnerable children and family violence services are being developed, and associated legislation reforms are under way with bespoke information sharing regimes currently under development.
- 28 In addition the design of a number of other information sharing initiatives and approaches may commence from September 2016 under the Cabinet Directive for Public Protection Information Sharing.
- 29 Many CI services will be impacted by these reforms and initiatives, and we will ensure that our use of client level data aligns with them. The client consent requirements for CI to share identifiable client data could be addressed or informed through wider approaches to information sharing.
- 30 We will report back to you on this alignment and the associated processes required to share identifiable client level data across MSD service lines or across agencies, for the purpose of targeting any intervention or provision of service to an identifiable individual.

From 1 July 2016 service providers will begin providing MSD with client level data for 23 percent of our expenditure

- 31 From 1 July 2016 we will start collecting client level data from 75 providers of following services:

Family Start and Early Start (32 providers)	\$37.93m
Early Start \$1.21m (1 provider)	
Social Workers in Schools (28 providers)	\$21.45m
Youth Workers in Secondary Schools (6 providers)	\$2.31m
Multi Agency Support Services in Secondary Schools (7 providers)	\$2.01m
Stand - Intensive Family Wraparound Service and Therapeutic Care and Education Service (1 provider)	\$13.9m
Expenditure (equals approx 23 percent of total CI expenditure)	\$77.6m

There are a lot of contracts.

- 32 Family Start providers are already collecting the required information from their clients and in some cases provide that data to us voluntarily.
- 33 We are advising the remaining providers that we want them to commence collecting client data as soon as possible. *What does that mean?*
- 34 To support this we are:
- progressively signing contracts and expect this to be completed in full in August 2016
 - informing providers who are not yet ready to collect the data, to be ready so that we can commence collection no later than 1 October 2016.

We will progressively collect client level data from the remaining providers, reaching 100 percent by 1 July 2017

- 35 From 1 November 2016, we will commence collecting client level data from financial capability service providers. This is a new service that will be introduced at this time to replace budgeting service.
- 36 From 1 July 2016, we will introduce the requirement to provide client level data from all the remaining providers. These providers will be required to implement this requirement starting 1 July 2017 unless they wish to do so prior to this date.

There are a small number of programmes where client level data is not collected

- 37 There are a small number of programmes where client level data is not collected because they do not have 'clients' in the way that other services do. Programme examples include:
 - provider capacity and capability type funding
 - public awareness campaigns and information resources such as the It's not OK campaign and SKIP.
- 38 We will use other approaches to assess the effectiveness of these services and the contribution that they make to achieve the objectives of the CIS. The approach used and the data that we will collect is dependent on the type of programme and the objectives it sets out to achieve.

We are building the Ministry's information systems and processes to safely store client data and support analytics processes

- 39 Work is underway to firm up the systems and process that will be used to safely store and analyse the client data we will be collecting.
- 40 The system will not be in place by 1 July 2016 as we are still progressing commercial contractual discussions. We are, however, planning to have it in place by 1 September 2016.
- 41 When the system is in place we will load client data and backdate the entry to the time that the provider commenced collecting the information from the client, which will be as early as 1 July 2016.
- 42 The following points summarise key aspects of the system and the work we are doing to ensure that it is fit for purpose:
 - client data will be recorded in a secure Ministry information system that is hosted on the cloud¹
 - the Ministry is looking at a system which is currently under use by the Ministry of Health and has had a robust privacy impact assessment
 - the system is designed to support robust and comprehensive analytics
 - in the longer term, once any required consent processes to support sharing of identifiable data are implemented, the Ministry may use the Integrated Access Platform (IAP data warehouse) and Insights MSD capability to undertake further data matching analysis.

7 G I O

¹ In Cloud hosting the applications run on many different servers. This ensures that if there is a failure in one device this will not cause a failure in the entire service.

We will report back to you on our progress in getting the full system in place for July 2017

- 43 You will shortly receive a report from us with details on the progress of firming up our IT system solutions.
- 44 We will report back to you with:
- an update on our progress towards collecting client data from all CIS service providers, excluding services where it is impractical to collect client level data, by 1 July 2017
 - details of the processes required to collect and share identifiable client information across MSD service lines and across agencies.
- 45 You may want to update Cabinet on the developments in collecting client level data. We suggest November/December 2016 would be an appropriate timeline to consider.

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9(2)(a) - Privacy of another

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