



24 APR 2018



Dear 

On 24 and 25 February 2018 you emailed the Ministry requesting, under the Official Information Act 1982, the following information:

- *Who designed the LET;*
- *Which factors does the LET take into account;*
- *Whether the LET is used to make decisions about individual entitlements, and if so, how.*
- *Is there any more publicly available information about SEM?*
- *Who designed SEM?*
- *Which factors/what type of information does SEM take into account when suggesting a service?*
- *If SEM suggests a particular care management service:*
- *(a) does a WINZ case worker make a final decision as to the appropriate care management service; and*
- *(b) does the client have the option to change to a different service?*
- *What plans are there for the second iteration of SEM and what information can you tell me about what it will be and how it will be used.*

This response also addresses your request received on 8 March 2018 for the following information:

- *Whether the Privacy, Human Rights and Ethics Framework for predictive risk modelling has been completed? If so, can you please provide me with a copy. If not, do you have a timeframe for completion?*

On 13 March 2018, you clarified that your request relates to the privacy, human rights and ethics framework for predictive modelling for vulnerable children.

The Ministry takes its responsibility seriously in protecting the privacy of client's information.

For the sake of clarity, I will address each of your questions in turn.

- *Who designed the Liability Estimator Tool (LET);*

The Liability Estimator Tool (LET) was designed by the Ministry of Social Development in 2016.

- *Which factors does the LET take into account;*

The LET is a predictive model that estimates the lifetime future benefit costs of beneficiaries as an indicator of need. It does this by drawing on historical information that links client characteristics to benefit payments.

The tool takes into account variables known to the Ministry related to:

- age
 - gender
 - children
 - employment history
 - benefit history.
- *Whether the LET is used to make decisions about individual entitlements, and if so, how.*

The LET is not used to make decisions about individual entitlements. The welfare system is universal and clients continue to receive financial assistance in the same way, regardless of the LET output.

- *Is there any more publicly available information about Service Effectiveness Model (SEM)?*

Information regarding the Service Effectiveness Model (SEM) is publically available in the Ministry of Social Development 2017/2018 Employment Outcome Investment Strategy document that is available on the Ministry's website here: www.msd.govt.nz/documents/about-msd-and-our-work/publications-resources/evaluation/investment-approach/service-delivery-investment-strategy-2017-18-version-for-release-july-2017-.pdf. Please refer to pages 7, 8 and 18 for information that relates to the models specifically.

- *Who designed SEM?*

The Ministry designed the SEM model in 2017.

- *Which factors/what type of information does SEM take into account when suggesting a service?*

The SEM is intended to reflect how much help a client might need from Work and Income and predicts which of the Ministry's case management services are likely to work best for them. It assesses the comparative effectiveness of services by estimating the benefit of placing a particular client into an intensive case management service rather than the least intensive service.

Intensive management involves case managers being more available to clients to work together in overcoming barriers to successful outcomes. This might involve supporting clients in accessing health or addiction services or being referred to an organisation that has specialist staff who can work directly with these clients.

It takes into account previous clients' experiences of support received through Work and Income to help the Ministry make better service decisions for current clients.

The SEM uses information known to the Ministry related to:

- age
 - gender
 - children
 - country of origin and time since immigration
 - benefit history
 - employment history.
- *If SEM suggests a particular care management service:
(a) does a WINZ case worker make a final decision as to the appropriate care management service
(b) does the client have the option to change to a different service?*

The Ministry's clients are streamed into different case management services using a combination of business rules and the SEM and LET scores. The Ministry offers a range of work focussed case management services that provide one on one support to clients. Once a client has been allocated to a work focussed case management service, case managers and clients work together to develop a plan to help them with ways to work together to achieve their goals. The case manager makes decisions about the specific products and services within the stream that the client is allocated.

Clients are able to talk through their individual needs with case managers at any time and to request access to specific programmes and support. Case managers can put a service 'on hold' for up to five months if they feel this is the best option for the client.

- *In MSD's Statement of Intent 2017-2022 reference is made to the "first iteration" of SEM. What plans are there for the second iteration and what information can you tell me about what it will be and how it will be used.*

No specific work has been undertaken on a second iteration. This comment simply indicates that the Ministry anticipates on-going work to further refine SEM and the Ministry's case management service.

- *Whether the Privacy, Human Rights and Ethics Framework for predictive risk modelling has been completed? If so, can you please provide me with a copy. If not, do you have a timeframe for completion?"*

The Ministry is developing a privacy, human rights and ethics (PHRaE) framework to build in the consideration of these factors to any new information uses. Please find enclosed a summary that may provide you with more information.

You clarified that this request relates to the predictive modelling for vulnerable children. On 5 April 2018, Oranga Tamariki has responded to your query about the use of predictive risk modelling to investigate a child's circumstance or to make decisions about the care and protection situation of a child. In their response, Oranga Tamariki has stated that they do not use predictive risk modelling and does not have plans to progress the Enhanced Intake Decision Making (EDIM) which was investigated in 2014. Therefore this part of your request is refused pursuant to section 18(e) of the Act as the information requested does not exist.

The principles and purposes of the Official Information Act 1982 under which you made your request are:

- to create greater openness and transparency about the plans, work and activities of the Government,
- to increase the ability of the public to participate in the making and administration of our laws and policies and
- to lead to greater accountability in the conduct of public affairs.

This Ministry fully supports those principles and purposes. The Ministry therefore intends to make the information contained in this letter and any attached documents available to the wider public shortly. The Ministry will do this by publishing this letter and attachments on the Ministry of Social Development's website. Your personal details will be deleted and the Ministry will not publish any information that would identify you as the person who requested the information.

If you wish to discuss this response with us, please feel free to contact OIA_Requests@msd.govt.nz.

If you are not satisfied with this response concerning the Liability Estimator Tool and the Service Effectiveness Model, you have the right to seek an investigation and review by the Ombudsman. Information about how to make a complaint is available at www.ombudsman.parliament.nz or 0800 802 602.

Yours sincerely



Nic Blakeley
Deputy Chief Executive Insights and Investment

PROTECTING CLIENT'S PRIVACY AND RIGHTS

WHAT IS THE PHRaE?

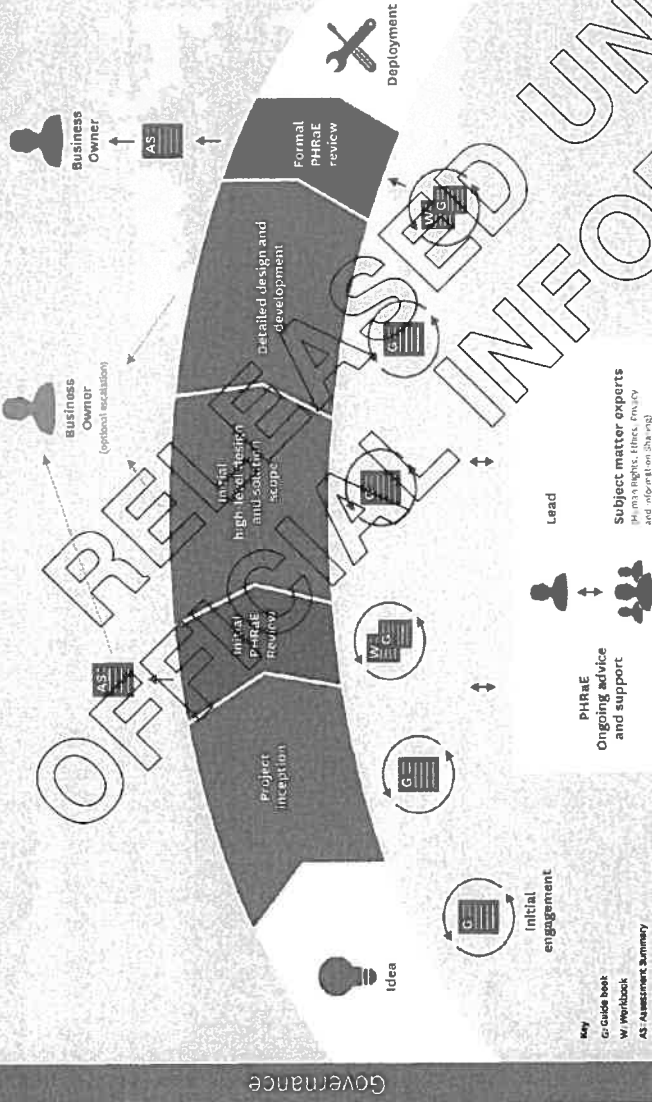
- A set of capability and tools with which users of information interact to ensure that people's P, HR and E are considered from the design stage of a new initiative.
- Engages projects in an iterative and active discussion throughout the project's lifecycle about the P, HR and E interests of people whose information they're using.
- The tools prompt discussion and capture the evidence of how the project has considered the P, HR and E and the basis for decision making in relation to these rights.
- The PHRaE combines the previously separate processes for privacy impact, human rights and ethical assessments, enabling a more streamlined and consistent approach.

ADVANTAGES OF USING THE PHRaE

- Risks that we are impinging on peoples P, HR or E rights are identified early so that we can modify our design or implementation approach.
- Early decisions to not progress initiatives, or to accept risk if value outweighs risk, can be made if risks cannot be mitigated.
- We can demonstrate that we understand the risks to people's P, HR and E and how we plan to manage them.
- P, HR, and E risks are often closely related. An integrated process allows us to assess these elements as a whole and consider the wider contextual environment.
- Ongoing discussions with projects throughout the project lifecycle, and over multiple projects, builds the organisational capability in responsible use of personal information.
- Demonstrates a consistent and transparent practice and shows our commitment to being a responsible custodian of personal information.

CURRENT USE AND NEXT STEPS

- The PHRaE has been trialled on new uses of personal information [all PM use, specific Ministry of Health and MSD research initiatives, new Service Design initiatives].
- Significant interest to develop the PHRaE as a cross-government capability.
- Investigating the development of an online, responsive assessment solution.
- Positive feedback from key internal and external stakeholders during consultation review of the tools and operating model.
- Improving our openness and transparency about our use of personal information and how we use the PHRaE to keep it safe.



BROAD AREAS COVERED THROUGH THE FRAMEWORK

- What are you trying to achieve and why?
- How will you ensure information is kept safe?
- What are the likely benefits and harms and to whom?
- How will you ensure the information used to make decisions is accurate?
- Is it necessary to use personal information?
- Will people be able to access their information?
- Will the initiative discriminate against some people?
- Are you legally able to use the information that we already hold?
- Will personal information be used for the purpose it is being used for?
- How will we engage with people about what we are doing with their information?
- How and from whom will any new information be collected?
- Will personal information be shared with others and if so why?

RESEARCH & EVALUATION ETHICS COMMITTEE

- For designated research purposes – members include: MSD representatives, Medical Researcher, an Ethicist, and a Client Advocate. The Committee provides independent ethical review (i.e. review and advice on whether the research and evaluation meets ethical standards) and more general ethical advice.
- The Committee is being made available to other agencies and we are considering formalising it through Health Research Council accreditation. The Committee has been developing principles and considering guidelines for certain techniques.