



6 July 2023

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Kia ora Bridget

**Your Official Information Act request, reference: GOV-025681**

Thank you for your email of 14 June 2023, asking for the following information under the Official Information Act 1982 (the Act):

*Please provide any relevant policy documents or comment on:*

*1) Acceptable communications that can occur between ACC and healthcare agencies (either with treatment providers or to administrative staff), particularly in relation to the sharing of health/treatment related information during the provision of ACC fully funded or subsidised treatment. This includes GP's and medical centres.*

*2) The level of transparency required so claimants are aware of those communications, eg claim file documentation, or situations when communications could be covert eg not known by claimant or documented on their file.*

*3) The use of HealthLink messaging service or any other messaging system, including text messages, to communicate with contracted providers or GP's, and the maintenance of these messages including access to them by claimants.*

*4) Does ACC directly or indirectly, access, add, update or delete information on NHI based systems such as the Medical Warning System (MWS) or Problem User Lists and if so, are these actions audited or documented in any way so such actions, and any relevant information, can be known and made available to claimants? I'm not sure if ACC is an authorised agency so when I say indirectly I mean via a third party who is authorised to perform some or all of those actions.*

**The following documents are included in Appendix 1:**

- Provider Conversation Principles and Guidelines
- Request and Obtain External Agency Records
- Request Clinical Records
- Arrange Medical Case Review (MCR) Assessment
- Obtain Client Authority to Collect Information
- When to save emails in Eos Policy
- At-Risk Clients Policy
- Upload Electronic Documents Received via HealthLink or secure file transfer

**Acceptable communications - Question 1**

Please see 'Provider Conversation Principles and Guidelines', 'Request and Obtain External Agency Records' and 'Request Clinical Records' which outline situations when ACC would contact a provider, such as to gather client records to help make cover decisions. There are also situations where ACC shares information with providers, such as for medical assessments or to obtain an opinion. Please see the 'Arrange Medical Case Review (MCR) Assessment' process, including the notes under 2.0.

The Health Information Privacy Code 2020 (HIPC) sets specific rules for agencies in the health sector regarding how they collect, use, hold, and disclose personal health information. You can find this at <https://privacy.org.nz/privacy-act-2020/codes-of-practice/hipc2020/>

#### **Transparency and documentation - Question 2**

See the *'Request and Obtain External Agency Records'* process which includes a step where we check if the client has provided ACC authority to collect their records. Please also see the *'Obtain Client Authority to Collect Information.'*

Our policy called *'When to save emails in Eos Policy'* states that we must upload correspondence to the appropriate client's record in Eos (our online claim filing system), including emails to providers. We also use other methods to communicate with providers about client's claims, such as phone calls and auto-generated letters. A record of phone calls are entered into Eos, and notes/letters sent and received by providers are uploaded to the relevant client's claim. You can request a copy of your claim files online here: <https://www.acc.co.nz/contact/request-for-personal-information/>.

There may be some situations where, due to risks we have identified, ACC may communicate externally without first informing the client. The relevant policy for this is *'At-Risk Clients Policy.'*

#### **HealthLink and other messaging services - Question 3**

ACC staff do not use HealthLink to communicate directly with contracted providers or GPs, instead HealthLink is used as a secure way for providers to submit documents to ACC such as clinical notes. I have attached a copy of our policy *'Upload Electronic Documents Received via HealthLink or secure file transfer,'* which shows how ACC uses HealthLink.

#### **NHI based systems – Question 4**

ACC does not directly or indirectly access NHI-based systems including but not limited to the Medical Warning System (MWS) or Problem User Lists. ACC is not able to access, add, delete, or update any information contained on NHI based systems.

As staff names were not requested, they have been deemed out of the scope of your request and removed.

#### **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).

Ngā mihi



Sara Freitag  
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Government Engagement