



# Memo

**To:** 9(2)(a) - Privacy of another  
**From:** 9(2)(a) Policy Manager  
**Date:** 20 June 2016

**Security level:** IN CONFIDENCE

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## The Collection and Use of Client Data to Support the Community Investment Strategy

### Purpose

This memo provides you with initial advice to support the Minister in her understanding of where the Ministry are at in collecting client level data to support the Community Investment Strategy (CIS) from 1 July 2016.

We will follow this up with a more comprehensive report to the Minister on Thursday. This advice is supported by the Ministry's Legal Services and Information Sharing Team.

### Initial Advice

***The Ministry can collect client level data from up to 23% of CIS services (by service expenditure) from 1 July 2016 to be used for service evaluation purposes; we do not need any further decisions from the Minister to do this***

CIS service providers can collect client level data on the basis that it is necessary to provide clients with the service. Service providers can share that data with MSD to be used for evaluative purposes without any new consent processes being put in place. To ensure adherence to privacy best practice the Ministry will ask service providers to notify clients that the client data they are collecting will be shared with the Ministry for evaluation purposes.

Service providers will be required to provide the following client level data to MSD:

- client demographic information (primary ethnicity, iwi, gender, date of birth, geographic area)
- client dependants: names and dates of birth (where appropriate)
- service level information: service name, start date, end date, attendance, pre-course assessment, post-course assessment (where relevant)
- service results information: results based achievement, i.e. change in knowledge, attitude, skills, behaviour and/or circumstances.

The Ministry's purpose for collecting this information is to:

- build an understanding about who is accessing what types of services, and where
- understand outcomes being achieved for individuals and cohorts of clients
- evaluate the performance of service providers
- to 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.

The use of the client data not requiring further consent will be limited to analysis and evaluation, aggregated summary reporting and research. We will be able to input the anonymised data into the Integrated Data Infrastructure where it will be subject to appropriate de-identification policies and controls.

The Ministry will not, under this process, 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 the Minister on the process required to use data in this way and associated consent processes.

***On 1 July 2016 we will start collecting client level data from 75 providers of the services set out in the table below***

1 July 2016	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
		<b>\$77.6m</b>

***An appropriate clause will be included in Providers' service contracts that will set out the Ministry's expectation that they provide us with client level information***

- Under the 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.
- Family Start service providers, the majority of the initial 23 percent of CIS services from which we are collecting client data, are already collecting client information, and this contract amendment will have limited impact on their business practices.

***We are working with the Office of the Privacy commissioner and the Ministry of Justice to ensure we follow best practice***

We are working with the Office of the Privacy commissioner and the Ministry of Justice to ensure we meet with legislative privacy requirements and that we are following best practice.

***We are taking steps to ensure that 100% of CIS client level data is collected under this method by 1 July 2017.***

We will report back to you with progress on this.