

A PROPOSAL TO BUILD A ROBUST, EVIDENCE BASED LEARNING SYSTEM FOR SOCIAL INVESTMENT

Background

MSD has advised that from July 2017 provider contracts will include the requirement to gather and share identifiable data about clients (ICLD) accessing services as a condition of funding. ComVoices members have engaged constructively with MSD on the basis of an earlier issues paper but significant issues remain unresolved. The purpose of this paper is to advise ministers of those issues and to propose an alternative approach to deliver a robust system that will support the social investment programme.

The Issues

We support for the use of data to demonstrate social investment success factors

- We understand government's drive for data
- We share the need to demonstrate the positive impact of services
- We want to engage positively in finding appropriate pathways forward

What are the problems with the process so far?

The underlying rationale has not been clearly articulated

- Government officials have been unable to explain how personal data will be used and how it will contribute to an overall understanding of service effectiveness
- Government officials have been unable to explain how data will be managed and shared and how the data collection fits in with broader strategies, in particular Statistics NZ IDI, the Social Investment Unit and the Data Futures work, including the Data Commons paper recently released.
- Officials from the government agency responsible for implementation appear unable or unwilling to engage in substantive discussion with providers about the rationale and basis for ICLD collection, focusing only on implementation at a detail level

Providers are concerned at the customer/service user impact

- A system is being imposed which is not focussed on providing for a quality customer experience and as a result is reducing access to high quality data. The system being imposed does not respect or demonstrate an understanding of the complex relationship between service users and service providers. In most cases this is not a simple, transactional relationship. Attempts to reduce it to this are likely to alienate the people who most require support, and therefore reduce the system's ability to gather high quality data. We are seeing early indications of this in the experience of the Building Financial Capability services where significant resistance is being shown by prospective customers.
- Privacy considerations have not been adequately identified and resolved – we note the Privacy Commissioner has initiated an Inquiry, due to report in March 2017
- We must remember that this data belongs to people. Human rights considerations have not been adequately identified and resolved
- Inadequate attention has been paid to developing and making available tools to assist the data collection and transmission process (for example, no standardised approved customer permission forms)
- The system will be imposed on all customers – those already known to government agencies, those who have no other contact with government, and those who fear further government intervention in their lives
- The ICLD process has a high likelihood of reducing trust between customer and service provider and between service provider and government – the 'no data, no funding' directive is a component of this.
- This lack of understanding of customer experience is likely to decrease access to very vulnerable, 'hard to reach' families or those in crisis (intimate partner violence, rape crisis, suicide prevention).

The process has eroded the constructive working relationship between providers and MSD

- The ICLD process has a high likelihood of reducing trust between service provider and government.
- The ICLD process has diverged from the May 2015 Cabinet paper: *Investing in Services for Outcomes: Community Investment Strategy – Completion and Sector Engagement* and no planning discussion or co-design has taken place with providers about this.
- ICLD has been imposed largely without discussion and at a time of great change (new legislation, new Ministry being established, changes arising from the implementation of the Community Investment strategy).
- The inability to debate and discuss the underlying rationale and purpose has impeded work on building information systems
- The compressed timeframe – with contracts due to be introduced for all providers from July 2017 – has had the effect of truncating discussion, limiting the ability to work together to find solutions. The timeframe is seen as unrealistic if there is a genuine commitment to delivering quality results.

The developing governance framework for an information system for social investment offers opportunities

In February 2015, the Government endorsed the principles of value, inclusion, trust and control proposed by the NZ Data Futures Forum, and set out a series of actions to support a high-value, trusted data-use environment. ComVoices supports this vision and the principles. They form a sound basis for the evidence based learning system for social investment we are proposing.

We understand that there is work being undertaken by the Social Investment Unit, Stats NZ and the Data Futures Forum to establish the components of an information system for social investment, and governance over how this is managed within the social services sector. The recently released Data Commons Blueprint report emphasises the risks involved in the public sector collecting, using and reusing data in ways that do not have the proper protections, sector buy-in or understandings of unintended consequences from collecting incomplete data and analysing, using and reusing the data in ways that have not been subjected to rigorous protocols.

The Report cautions that ‘...there is still potential for misuse and increased marginalisation of individuals and communities’. The ‘Blueprint’ for data commons proposes seven areas of data management which need to be worked through to establish a coordinated, high trust data community.

The Social Investment Sector Board’s briefing to the incoming Social Investment Minister identifies key components of the social investment approach, including understanding target populations for investment and understanding the needs of these populations and the types of interventions that are effective in producing positive results. The briefing notes that consideration should be given to exploring ‘...collective impact models or approaches, and creating an open/transparent environment for generating and sharing evidence, developing linked administrative datasets and providing opportunities for non-government organisations, philanthropic organisations, Iwi, private sector businesses and community groups to access the same information and engage in the search for social investment that makes a difference’

The work being undertaken by the Social Investment Unit (SIU) to lead the social investment approach across the social sector to ‘...build tools, methods, standards and definitions for all agencies to use, and facilitating safe and secure data exchange (including working with the IDI). We understand a proposal is being considered by Cabinet that sets out the institutional arrangements for SIU, including its potential role as leader across the sector to support the development of the social investment approach.

It is with this developing system governance and leadership backdrop in mind that we propose a way ahead with respect to the current impasse with MSD.

Our Proposal

We propose a possible solution to meet government, customer and service provider expectations

We propose MSD and provider representatives' work together to implement a process which achieves government's drive to understand what works and improves impact for customers.

We propose the following matters be addressed:

- Identification and explanation of the proposed **overall framework**, including how the MSD investment approach fits into the big picture for data and evidence across the social sector, and how this links with the IDI and Data Futures initiatives and whether the data needs of MSD can be met through those strategies/mechanisms.
- Development of a clear **rationale** that can be understood by providers and clients. Explanation of the outcomes being sought from this investment approach and how these link back to the data to be collected. Identification of how and what will contribute to a learning system across social services and how this could be enriched to provide a fuller understanding of client needs and service response.
- Identification of what **data and other evidence** is needed and how it will be used.
- Agreement about the key features for **data sharing and use and reuse** (including privacy considerations, data sharing protocols, MSD protocols for access and sharing). Identification of the systems the provider and the government officials will need in order to gather and utilise the evidence and research data
- Identification what data is needed for **different groups**. Our initial thinking is a combination of:
 - Individual customer level data provided where customers are referred by a government agency for services from an NGO. The service provider will confirm they have accepted the customer – government agency will note that in their records and be able to track individual outcomes
 - Information on self-referred customers will be provided in anonymised way, while still allowing full access to demographic and other data to track service success
- Identify the **resourcing and support needs** of service providers to gather and provide data to government.
- Identify **risks and mitigations**. A key area of concern is that the data sharing provisions will deter help-seeking.
- Set out the proposed development and **implementation process and timeframe**, including parties to be involved (eg OPC, Stats NZ). This shared work requires flexibility about timeframe and implementation path. Our initial view is that this system needs to be introduced via a mechanism that builds trust and equips providers with information and confidence.

ComVoices seeks the agreement of Ministers to support this approach and to direct officials to work with the provider sector to achieve a sustainable learning system that can give confidence in the ongoing improvement of current and future service responses.