

## ENGAGING WITH CONSUMERS AND TECHNOLOGY TO CREATE A MORE EFFICIENT, SUSTAINABLE (AND FRIENDLY!) FOI SERVICE

Laura Hartmann, General Counsel, Grampians Health

26 February 2025



- Project motivation
- Our approach
- Phase 1: Designing language and information through consumer engagement
- Phase 2: Process automation
- Reflections 8 months in
- More information



# Motivation



- Compliance with professional standards and FOI Act Obligations;
- Consolidation of 4 government agencies under FOI;
- Increasing FOI applications:

| 2021-2022 | 2022-2023                | 2023-2024            |
|-----------|--------------------------|----------------------|
| 893, 18th | 992,15 <sup>th</sup> 11% | 1170, 16th   17.8% ↑ |

- Limited resourcing available to address rising FOI applications;
- We are the largest employer in our region- our processes are embedded in our communities;
- Align our service with our strategic priorities and conduct FOI service in line with our values.

### Our role in patient-centered care

• Access to medical records is an important consumer right



# Our Approach

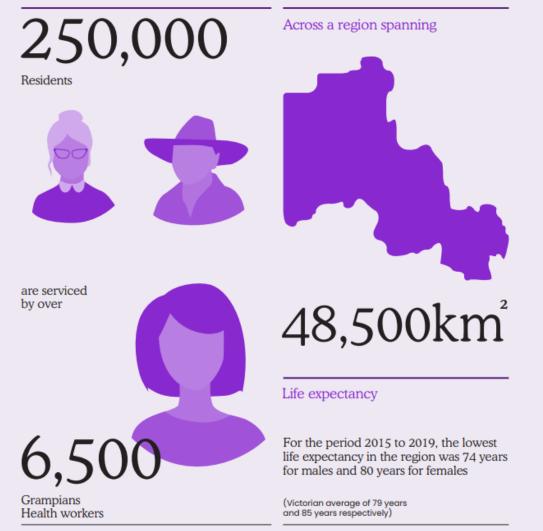


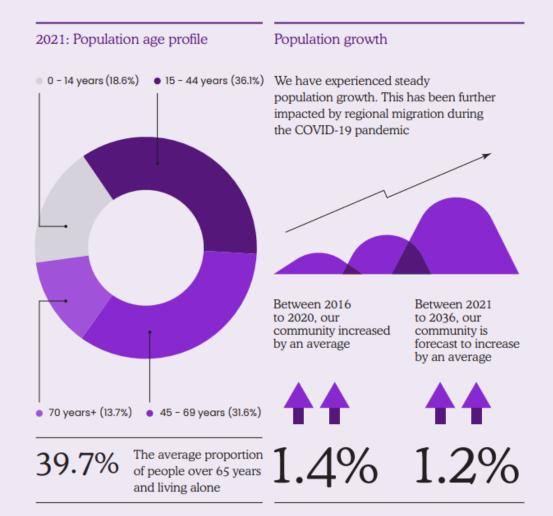
- Who are our consumers? What do we know about them?
- How do we communicate with them? How might this make them feel?
- What are our current processes, what works well, what could be improved?
- Frameworks:
  - <u>Safer Care Victoria</u>
    - Partnering with consumers is:

'about actively working with people who use the healthcare system to ensure that health information and services meet people's needs'

- WHO Communicating for Health: Principles of Effective Communications
- ACSQHA Person Centred-Care and Writing Information for Consumers

# Our People





Many communities in our region experience socio-economic disadvantage, and are more likely to suffer ill-health, particularly chronic disease

## Our Health

Child and infant health

In 2018



of children were developmentally on track in physical health and wellbeing



Cancer

Between 2015 to 2019

Premature mortality rates due to cancer were significantly higher

in parts of the Grampians region than the Victorian average

### Mental health Rates of poor mental healthand behavioural problemsare increasing across theGrampians region

Between 2015 to 2020, there was an average of 2,197 annual births in our community Aboriginal and Torres Strait Islander population health



In 2019/20, the rate of Indigenous health checks was significantly poorer in the Grampians region (average 14.0%) than the nation-wide rate (28.0%)

Alcohol-related harm

Obesity

In 2017 the rate (64.4%) of adults at risk of alcohol-related harm was higher than the Victorian average (59.5%)

In 2017/18



of residents aged 18 years and over were obese

#### Chronic disease

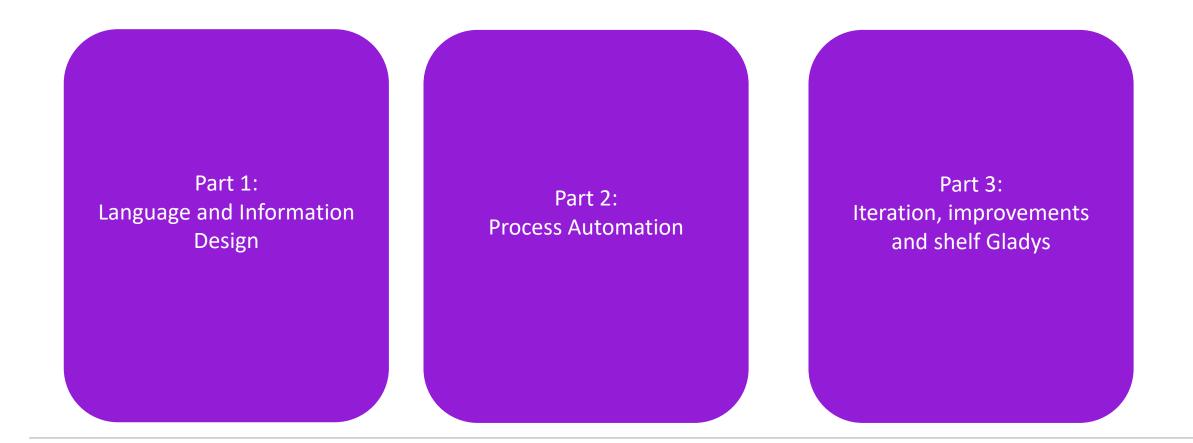
Chronic diseases are long lasting conditions which are persistent and have social and economic consequences that can impact on quality of life In 2017

30.3%

of the adult population had more than two chronic diseases



### Solve the right problem, before solving the problem right!





# Language and Information Design

### Gladys

Age: **69** Occupation: **Mum, Nanna** Status: **Widow** Location: **Horsham, Regional Victoria** 

### **About Gladys**

Gladys lives in Horsham and travels to Ballarat once a week to look after her 3 grandkids. Her other son lives locally and works as a plumber.

During the week she helps kids at the local primary school with their readers, is part of a walking group and on Thursday mornings she has coffee out with her friends.

Glad's husband passed away from a chronic heart condition. She used to drive him to Ballarat for treatment every week.

#### **Motivation**

Keeping fit and active is important to Gladys. She wants to keep up with her grandkids and her hobbies.

#### Goals

Gladys wants to be well informed about her health and her options for care.



## Readability statistics

FKG 12.6 = A Brief History of

|                | MS Word      |      | Readable |               |            |       |      |                  |
|----------------|--------------|------|----------|---------------|------------|-------|------|------------------|
|                | Word Count   | FRE  | FKG      | Passive Voice | Word Count | FRE   | FKG  | Passive<br>Voice |
| Acknowledge    | ement Letter |      |          |               |            |       |      |                  |
| GH Original    | 182          | 39.1 | 12.6     | 50%           | 159        | 55.75 | 7.95 | 5%               |
| OVIC           | 240          | 57.9 | 9.1      | 27.2%         | 211        | 71.43 | 5.92 | 3%               |
| GH<br>Redesign | 223          | 82.2 | 4.0      | 0.0%          | 220        | 83.90 | 3.03 | 0%               |
| Decision Let   | ter          |      |          |               |            |       | ,    |                  |
| GH Original    | 175          | 28.3 | 14.0     | 14.2%         | 177        | 51.9  | 8.6  | 2%               |
| OVIC           | 753          | 38.9 | 12.0     | 27.5%         | 855        | 47.04 | 9.46 | 3%               |
| GH<br>Redesign | 395          | 52.7 | 8.3      | 9.0%          | 361        | 60.25 | 6.38 | 1%               |

### Time

## Acknowledgement letter: Original

#### Your freedom of information request is valid and being processed

I refer to your request under the *Freedom of Information Act 1982* (Vic) (**FOI Act**) which we received on 01/01/2023

You requested access to:

My complete medical record.

#### Valid request

We received the application fee on 01/01/2023 and a receipt is enclosed.

We considered your request for a fee waiver and agree to waive the application fee.

Your request is valid, and we are processing it. We have 30 days from the date we receive your request to provide you with a decision. As such, the due date for us to make a decision on your request is 31/01/2023.

It makes me feel like I've done something wrong to ask for the information, or I haven't asked for the information correctly

I'm not sure about the whole "valid request" wording at all, like it almost says that some people's requests are ridiculous, but yours, yours is fine

## Acknowledgement Letter: Redesign

#### Your request under the Freedom of Information Act 1982 (Vic)

Thank you for your request.

Please keep this letter. Its sets out important information about your request.

| Your reference number             | 12345678                                                                                                                                                                                                                                                                                       |  |  |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|
| Date of your request              | 28 April 2023                                                                                                                                                                                                                                                                                  |  |  |
| What you've asked for             | My complete medical record.                                                                                                                                                                                                                                                                    |  |  |
| When will you receive a response? | 29 May 2023                                                                                                                                                                                                                                                                                    |  |  |
| How much will it cost?            | <ul> <li>Our current charges are:         <ul> <li>Secure email of records: no charge</li> <li>CD of records: \$20.00</li> <li>Photocopy of records: \$0.20 per A4 page</li> </ul> </li> <li>We'll let you know how much your application is going to cost once we've processed it.</li> </ul> |  |  |
| How can you contact us?           | <u>گ</u>                                                                                                                                                                                                                                                                                       |  |  |

I can find the information without having to read through paragraphs of nonsense to get it...this person knows their job, but is friendly

This document...makes me feel like I'm working with a service...is very professional, but friendly

### **Decision Letter: Original**

#### Section 33(1) of the FOI Act

- 9. I applied the exemption in section 33(1) of the FOI Act to the medical record. This exemption relates to documents which affect personal privacy of people other than an applicant.
- 10. A document is exempt under section 33(1) of the FOI Act if two conditions are satisfied:
  - (a) disclosure of the document under the FOI Act would 'involve' the disclosure of information relating to the 'personal affairs' of a person other than an applicant; and
  - (b) such disclosure would be 'unreasonable'.

Personal affairs information of individuals other than yourself

- 11. The Victorian Civil and Administrative Tribunal (**Tribunal**) has held a document will disclose personal affairs information if the document is capable of, either directly or indirectly, identifying a particular individual whose personal affairs are disclosed. As the nature of disclosure under the FOI Act is unrestricted and unconditional, this is to be interpreted by the capacity of any member of the public to potentially identify a third party.
- 12. The document contain information about other people, which I am satisfied is personal affairs information.

Disclosure of the personal affairs information would be unreasonable

- 13. The concept of 'unreasonable disclosure' involves balancing the competing public interest in the disclosure of official information with the personal interest in privacy.
- 14. In this case we have decided it would be unreasonable to release the information because the person's privacy outweighs the information being made available to the public.

...I really want to skip over this but I should read it... the bit where it got information dense I was like 'boring, boring, boring

### [at paragraph 10] I'm over reading that

I didn't read 11, 12, 13 or 14

### Decision Letter: Redesign

We've removed some information in the record, because:

| FOI Act | Explanation                                                                                                                                                                       |
|---------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         | <ul> <li>The documents contain:</li> <li>Personal affairs information about another person; and</li> <li>It is unreasonable for us to disclose that information.</li> </ul>       |
|         | "Personal Affairs" information means information which is capable of, either directly<br>or indirectly, identifying a particular individual whose personal affairs are disclosed. |
| 33(1)   | We have to be cautious about releasing personal affairs information under FOI, because can't control what happens to the information once we release it.                          |
|         | <ul> <li>We must weigh up:</li> <li>The public's interest in having the information; and</li> <li>A person's interest in their privacy.</li> </ul>                                |
|         | In this case, we've decided that a person's privacy outweighs the information being made available to the public.                                                                 |

This kind of feels like, hey, you're getting everything you needed, except for this tiny bit. [It] sounds ridiculous, because it's the same information, but it feels a lot warmer, a lot more personable

It's spelling it out, what it is, what it means, that's good...I think this one is better because the other one said, you know, this is the decision of the body, whereas this one says we have to be cautious. You know, that's saying why

## **Review Right**

#### Your Review rights

If you're not happy with our decision, you can:

- Contact us; or
- Ask the Information Commissioner to review our decision.

To ask the Information Commissioner for a review, you need to:

- Write to the Office of the Victorian Information Commissioner (OVIC);
- Tell them what decision you're asking them to review; and
- · Tell them that the agency is Grampians Health

You must do this no more than 28 days from when you get this letter.

The OVIC also has a website with:

- a review form you can download; and
- information about what to expect in a review.

The OVIC's details are:

|   | www.ovic.vic.gov.au         |
|---|-----------------------------|
| S | 1300 00 6842 (1300 00 OVIC) |

I like the symbol there is showing the importance of...like the urgency if you would like to follow this up further that is the time frame...I like that it shows that if this is something that's important to you, make sure you action it

> You've got the details of the OVIC there, you can contact them. And then just do that within the 28 days



# **Process Automation**

### **Process Automation**

### **Process Mapping**



### **Process Automation**

Low Code Automation

Demonstration

• This demo shows fictional data entered into a test environment. The names you will see are made up. Any similarity to real people is unintentional. No patient data has been used in this demonstration.



# Reflections: 8 months in

### Reflections

- Efficiency gains Reallocation of work
- Absorbed review work from another department
  - No overall increase in headcount
    - Team building
- Great things can be achieved on a small budget!

- Uptake by key users (insurers, law firms)
  - Complexity of automation

### More information

• Language design:

"Creating Gladys: How Legal Design Can Support Person-Centred Care in Public Health"

Creating Gladys: How Legal Design Can Support Person-Centred Care in Public Health | Published in Legal Design Journal

• Blank template letter pack:

legalservices@gh.org.au



# Questions?

### grampianshealth.org.au

