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3 August 2021

Mr. Craig Fraser, CEO & Mr. Bill Brown, Chairman of Directors,

South West Alliance for Rural Health,
Ryot St.,
Warrnambool,
VIC. 3280.

Email: swarhoffice@swarh.vic.gov.au

Re: SWARH, Barwon Health and IRIS for health

The Australian Privacy Foundation (APF) is the country's leading privacy advocacy organisation. A brief backgrounder is attached.

I refer to the recently announced InterSystems' IRIS health data platform rollout involving Victoria's South West Alliance for Rural Health (SWARH) and Barwon Health.¹ The IRIS platform evidently supports artificial intelligence (AI), machine learning, business and clinical intelligence. We hope to better understand the IRIS rollout and the core aim/s underpinning this implementation; to that end we request a briefing and explanation of what is being planned for the IRIS platform:

1. Where is/has the IRIS platform been used elsewhere in health?
2. What results have been achieved using the IRIS platform?
3. What are the IRIS system capabilities and objectives?
4. What are your planned objectives for the roll out?

We understand you may be seeking to improve patient health and welfare while supporting clinical practice.

So, regarding the APF's key interests:

1. What privacy and consent approaches are intended to support the IRIS rollout? A sample of the information to be provided to make sure the recipient/patient/client is fully informed would be very helpful here.

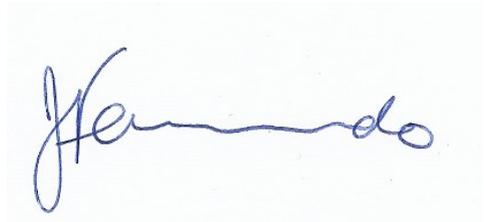
2. Would you please outline the mechanisms linked to the IRIS platform for governance, ethical oversight and identification of the sort of unintended consequences or effects that are increasingly being recognised as associated with the use of particular algorithmic methods and data sets?²

3. Is there an ethics application I can peruse to digest more information about the work?

Your response to these questions will advance and clarify APF understanding of the IRIS rollout.

A publicly available response to the concerns listed here will be an important foundation of the community trust needed to advance digital health implementations into the future. We would be glad to help you develop responses to these issues.

Yours sincerely

A handwritten signature in blue ink that reads "Fernando". The signature is written in a cursive style with a long horizontal line extending from the end.

Dr. Juanita Fernando
Chair, Health Committee
Australian Privacy Foundation

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ACKNOWLEDGEMENT

I acknowledge and thank the members of the APF Health Committee and Board for their guidance herein.

REFERENCES

1. McDonald, K. SWARH and Barwon Health to roll out IRIS for health for real-time data analysis, Pulse IT 27 July 2021. <https://www.pulseitmagazine.com.au/australian-ehealth/6172-swarh-and-barwon-health-to-roll-out-iris-for-health-for-real-time-data-analysis>
2. Ionel Petrus, E.S. AI-Based Control Algorithms: Sequence of Operations, Deep Learning, Machine Learning, and More Magazine. 25 February 2021. <https://www.esmagazine.com/articles/101234-ai-based-control-algorithms-sequence-of-operations-deep-learning-machine-learning-and-more>

Australian Privacy Foundation

Background Information

The Australian Privacy Foundation (APF) is the primary national association dedicated to protecting the privacy rights of Australians. The Foundation aims to focus public attention on emerging issues that pose a threat to the freedom and privacy of Australians. The Foundation has led the fight to defend the right of individuals to control their personal information and to be free of excessive intrusions.

The APF's primary activity is analysis of the privacy impact of systems and proposals for new systems. It makes frequent submissions to parliamentary committees and government agencies. It publishes information on privacy laws and privacy issues. It provides continual background briefings to the media on privacy-related matters.

Where possible, the APF cooperates with and supports privacy oversight agencies, but it is entirely independent of the agencies that administer privacy legislation, and regrettably often finds it necessary to be critical of their performance.

When necessary, the APF conducts campaigns for or against specific proposals. It works with civil liberties councils, consumer organisations, professional associations and other community groups as appropriate to the circumstances. The Privacy Foundation is also an active participant in Privacy International, the world-wide privacy protection network.

The APF is open to membership by individuals and organisations who support the APF's Objects. Funding that is provided by members and donors is used to run the Foundation and to support its activities including research, campaigns and awards events.

The APF does not claim any right to formally represent the public as a whole, nor to formally represent any particular population segment, and it accordingly makes no public declarations about its membership-base. The APF's contributions to policy are based on the expertise of the members of its Board, Committees and Reference Groups, and its impact reflects the quality of the evidence, analysis and arguments that its contributions contain.

The APF's Board, Committees and Reference Groups comprise professionals who bring to their work deep experience in privacy, information technology and the law.

The Board is supported by Patrons The Hon Michael Kirby AC CMG and The Hon Elizabeth Evatt AC, and an Advisory Panel of eminent citizens, including former judges, former Ministers of the Crown, and a former Prime Minister.

The following pages provide access to information about the APF:

- Policies <https://privacy.org.au/publications/by-date/>
- Media <https://privacy.org.au/home/updates/>
- Current Board Members <https://privacy.org.au/about/contacts/>
- Patron and Advisory Panel <https://privacy.org.au/about/contacts/advisorypanel/>

The following pages provide outlines of some of the campaigns that the APF has conducted:

- The Australia Card (1985-87) <https://privacy.org.au/About/Formation.html>
- Credit Reporting (1988-90) <https://privacy.org.au/campaigns/consumer-credit-reporting/>
- The Census (2006) <https://privacy.org.au/campaigns/census2006/>
- The Access Card (2006-07) <https://privacy.org.au/campaigns/id-cards/hsac/>
- The Media (2007-) <https://privacy.org.au/campaigns/privacy-media/>
- The MyHR (2012-) <https://privacy.org.au/campaigns/myhr/>
- The Census (2016) <https://privacy.org.au/campaigns/census2016/>