

August 1, 2022

Dr Keith McDonald,
Chief Executive Officer
South Western Sydney Primary Health Network (SWSPHN)

enquiries@swsphn.com.au
ceo@swsphn.com.au

cc: Nick McGhie, Digital Health and Data Manager, SWSPHN.

Dear Dr. McDonald,

The iRad interoperability of consented health records

The APF is the nation's pre-eminent civil society body concerned with privacy. A brief backgrounder is attached.

The Foundation was gratified to note your emphasis on obtaining patient consent as a necessary foundation of the iRad interoperability project, which supports information security, fostering data reliability and quality.¹ Your focus on achieving interoperability, underpinned by patient consent, is commendable.

Recent media coverage does not provide much information about the process used by South Western Sydney Primary Health Network (SWSPHN) to obtain the patient consent underpinning the iRad endeavour however. The Foundation hopes to understand more about the consent process you used, and if appropriate, to offer support or else to offer suggestions about possible refinements. We ask whether you are willing to provide us with more information about the 'patient control' and best practice consent aspects of the interoperability project.

The information we seek:

1. Is the patient consent exercised in the project revocable?
2. What information is given to the patient before and after the consent process?
3. Can consent be fine-grained to apply to only certain types of information or certain medical conditions, or does it consist of bundled, generic consent?
4. Does the consent process include a patient's right to know who has accessed their records and the reasons why?

5. Has a Privacy Impact Assessment, patient-centred risk analysis or an information security audit occurred post implementation?
6. Where, and under what jurisdiction, is the SWSPHN data set hosted?

We congratulate your understanding of the importance of achieving community trust if patients are to depend on digital health implementations into the future. The APF look forward to your reply, and would be happy developing further engagement on this issue.

Yours sincerely,



Dr. Juanita Fernando
Chair, Health Committee, APF
Juanita.Fernando@privacy.org.au

REFERENCE

1. Ang, Adam. Sydney project fixes interoperability woes by connecting 70 care sites via cloud. Healthcare IT News; July 5, 2022. <https://www.healthcareitnews.com/news/anz/sydney-project-fixes-interoperability-woes-connecting-70-care-sites-cloud?>

About the Australian Privacy Foundation

The Australian Privacy Foundation (APF) is the nation's foremost independent civil society body concerned with community data protection, privacy and information security expectations. The APF is supported and advised by a panel of notable Australians, and worldwide luminaries including former judges and former Ministers of the Crown.

The Foundation leads the fight to defend the right of people to control their personal information and to be free of needless intrusions. The APF continues to draw government attention to human privacy rights issues in frequent submissions to parliamentary committees and government agencies.

The following pages provide access to further information about the APF

Policies	https://privacy.org.au/publications/by-date/
Media Releases	https://privacy.org.au/home/updates/
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