

29 October 2015

Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Dear Committee Secretary

Medicines Australia welcomes the opportunity to provide input to the inquiry into Health Legislation Amendment (eHealth) Bill 2015, the Bill to make changes to the personally controlled electronic health record (PCEHR) system.

Medicines Australia supports further consultation and discussion through the inquiry aimed at the Government's response on the review of the PCEHR system (PCEHR Review), collated in the Bill. We broadly support the changes proposed in the Bill, notably changing the PCEHR system's name into My Health Record system, preparing for new governance arrangements, improving usability of the system, and conducting participation trials for the opt-out system.

Medicines Australia represents the research-based pharmaceutical industry in Australia, which brings new medicines, vaccines and health services to the Australian market. Today, over 50 pharmaceutical companies and around 400 locally-owned medical biotechnology firms, operate in Australia. Our members are responsible for the discovery, research, development and commercialisation of up to 86% of medicines currently available on the Pharmaceutical Benefits Scheme (PBS) by value.

Medicines Australia supports that the Bill will enable opt-out trials to be undertaken for individuals in a manner that retains the patient controls as provided in the PCEHR. Digital collation and sharing of information by health care providers will contribute to the quality of services provided by different health professionals and will enhance consultation and management of patient care across treatment settings. Medicines Australia previously advocated for an opt-out system and are pleased that this is being incorporated and proposed as part of the Bill. Medicines Australia believes an opt-out system will enable the My Health Record to provide better, more useful and usable information to healthcare practitioners, which will in turn lead to improved whole-of-care for patients.

We note the intention of the Bill to implement the recommendations from PCEHR Review in September 2014 for:

- providers to consider the minimum key content of a PCEHR is allergies, adverse events, a current medication list and transfer of care summaries, and pathology and diagnostic imaging results are very useful; and
- key information in the PCEHR, such as medications, must be current and easy to find – the biggest concern is around current usability.

Medicines Australia believes this information is of utmost importance, and further suggests that the mandatory inclusion of medications should be considered in the eHealth system. We contend that the mandatory inclusion of medications in the My Health Record will go a long way to reducing and in some cases eliminating *avoidable medication misadventure*, error and mishap.

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Medication misadventure may occur through a number of circumstances, such as when patients have duplicate medications prescribed; change or add new treatments whilst continuing previous ones; when moving from hospital to primary care setting; or due to overuse, misuse and abuse. According to a literature review completed by the Australian Commission on Safety and Quality in Health Care, up to 230,000 hospitalisations per year are attributed to medication misadventure with many of these being avoidable<sup>1</sup>. Optimising the My Health Record to improve the recording, sharing and management of prescribed (and non-prescribed) medication will enable better monitoring of patients' medication management through the primary care, hospital, aged care and pharmacy settings. This will in turn reduce duplication, missed or inappropriate prescribing and dispensing, overuse, misuse and abuse of medications. Further, this will contribute to improved safety and quality use of medicines, which is a mutual goal of government and industry and a pillar of the National Medicines Policy. Good medication management can enable many Australians to continue to lead productive lives and make active contributions to the community and economy.

We understand that the Bill will simplify the privacy framework by revising permissions to collect, use and disclose information. This will make it easier for participants in the system to understand what they can and cannot do. Medicines Australia trusts that the Government will implement sufficient measures to ensure patient privacy is protected. These measures should ensure that only authorized health providers can access individual health records. We hope that there will be further opportunity to work with the Government to ensure that a Quality Use of Medicines approach as specified in the National Medicines Policy is adhered to in implementing the opt-out trials and amending patient privacy permissions.

Medicines Australia supports the simplification of the policy framework. An easier to understand and implement policy framework will support more accurate treatment and assist in preventing adverse health events. The proposed changes will give healthcare providers the latest information of medicines prescribed and will enable health providers to make a thorough assessment of treatment.

Medicines Australia supports the Bill and its intention to achieve a better partnership between patients and healthcare providers in healthcare. We thank you for your consideration of our submission and would welcome the opportunity to work together with Government to assist in the development and implementation of medication management elements of My Health Records.

Yours sincerely

Tim James  
**CEO**

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<sup>1</sup> <http://www.safetyandquality.gov.au/wp-content/uploads/2013/08/Literature-Review-Medication-Safety-in-Australia-2013.pdf>