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Joint Faculty of Intensive Care Medicine
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Ms Naomi Bleaser
Committee Secretary
Senate Standing Committee on Community Affairs
PO Box 6100
Parliament House
Canberra ACT 2600

Email: community.affairs.sen@aph.gov.au

Dear Ms Bleaser

**Australian and New Zealand College of Anaesthetists Submission
Senate Standing Committee on Community Affairs**

***Healthcare Identifiers Bill 2010 and
Healthcare Identifiers (Consequential Amendments) Bill 2010***

The Australian and New Zealand College of Anaesthetists (ANZCA) has been actively engaged in earlier consultations regarding the e-Health initiative and is pleased to now comment in relation to the Healthcare Identifiers Bill 2010 and the Healthcare Identifiers (Consequential Amendments) Bill 2010.

ANZCA is the professional medical body in Australia and New Zealand that conducts the education, training, and continuing professional development of anaesthetists and pain medicine specialists. ANZCA represents more than 3,500 Fellows across Australia and serves the community by ensuring the highest standards of clinical practice and patient safety. This commitment has resulted in Australia and New Zealand having one of the best patient safety records in the world and contributes to the high level of health outcomes enjoyed by most Australians. The College, however, recognises the need to improve the health system to ensure greater access and equity for all Australians.

Appropriate infrastructure, including high quality information and communication technology support, is a prerequisite for this need is to be met. We, therefore, welcome the development of the e-Health national strategy and

acknowledge its potential to improve the quality, safety and overall patient experience of the healthcare system.

ANZCA offers the following comments with regard to healthcare identifiers:

The establishment of national healthcare identifiers for patients and healthcare providers is supported, on the condition that appropriate safeguards protect the privacy of the individual, in accordance with the National Privacy Principles. We agree that the patient must have the final say about what happens to their record and be responsible for use of their individual identifier. We understand that independent oversight will be provided by the Federal Privacy Commissioner.

ANZCA is highly supportive of the proposed provision of 'supporting materials and appropriate sources to refer to consumers to for more information' (explanatory memorandum, page 4). We strongly recommend that prior to dissemination such resources are circulated to consumers for review. The success of e-Health is heavily reliant on patient acceptance.

Occasionally, information about a patient may be very sensitive. It is important that patients, confident in the system's security, feel able to provide such information to their treating doctors. For example, an HIV and immune suppressed patient may require different therapeutic management from a non-immunocompromised patient with otherwise similar disease. All efforts must be made to ensure that such information is highly privileged and employed only for patient management purposes.

Occasionally it may take time to establish a patient's identity. In this situation, the system must allow for the entry of an unknown patient's profile into the system, and the subsequent integration of information should a previously established electronic record exist. Disclosure in emergency situations should be driven by the right to treatment and the right to refuse treatment – this area needs to be closely examined.

Use and disclosure provisions for other purposes (Clause 24(1)(a)) for a range of business activities 'regularly undertaken to support the delivery of healthcare' (explanatory memorandum, page 18), such as quality assurance and evaluation, is supported.

The concept of a Healthcare Provider Directory (Clause 31) that facilitates communication between healthcare providers is supported subject to appropriate consent from individual providers. The Directory would assist referrals to specialists and other providers, as an up to date contact register.

As alluded to earlier with regard to patient acceptance, the development and implementation of a comprehensive communication strategy will be critical to the success of the new system, for the purpose of educating and promoting the benefits to **all** stakeholders. ANZCA is able to assist via established communication channels (web, e-news, and bulletin) to its Fellows and trainees.

Thank you for the opportunity to comment on the legislation. We would be pleased to provide further information as required. The relevant contact is John Biviano, Director Policy, Quality & Accreditation (jbiviano@anzca.edu.au).

Yours sincerely

Dr Leona Wilson
President