

PRIVACY BLUEPRINT – UNIQUE HEALTHCARE IDENTIFIERS

Release Notes
13 December 2006

Announcing the release of NEHTA's *Privacy Blueprint* – managing privacy issues arising from NEHTA's Unique Healthcare Identifiers program.

Australia's healthcare system relies on the ability to uniquely and accurately identify individuals. Healthcare requires the constant collection, exchange and transmission of health information. This is usually in the context of information about a single patient being exchanged between multiple healthcare providers. It is critical for patient safety and privacy that this information exchange occurs reliably and securely.

The Council of Australian Governments has committed Australia to a single, national approach to identifying individuals and healthcare providers for the purposes of health communications. This approach, being developed by NEHTA, is known as the Unique Healthcare Identification (UHI) Service.

The UHI Service will involve the allocation, issuing and maintenance of unique identifiers for individuals (known as the Individual Healthcare Identifier or IHI) and healthcare providers (the Healthcare Provider Identifier or HPI).

HPI: Unique identification for every healthcare professional

The transmission of patient information must ensure reliable delivery to the right healthcare practitioner. Identifying every one of the 400,000+ healthcare providers in Australia by a unique number offers significantly greater reliability than using practitioner names and addresses.

IHI: Unique healthcare identification for all individuals

As important health information about patients is shared between clinicians, it must be absolutely clear which patient the particular information relates to. The current practice of identifying patients - often by simply using their name and address - is not safe enough. Identifying individuals by a unique number offers significantly greater protection for this information. The IHI will only be used to identify individuals for the purposes of healthcare; and individuals will not be required to produce an IHI to receive healthcare.

NEHTA and Privacy

From the outset, NEHTA has recognised that privacy is an issue of great concern to Australians – particularly in the health sector. NEHTA outlined a broad overview of its position on privacy in its *Approach to Privacy* publication (available from www.nehta.gov.au).

NEHTA must manage the risks of a particularly complex legislative and regulatory environment while also recognising that privacy perceptions of the Australian community play a major role in ensuring the success of e-health systems. Confidence and trust build upon a strong privacy foundation. The UHI Service will only be successful if it meets community expectations regarding privacy.

Privacy Blueprint

NEHTA's *Privacy Blueprint – Unique Healthcare Identifiers* sets out a systematic framework to consider the privacy issues raised by the collection and use of information involved with the UHI Service.

A Privacy Blueprint aims to comprehensively identify the range of privacy issues that apply to a specific initiative, so that corresponding action steps may be subsequently undertaken to address those issues within the design, privacy impact assessment or implementation programs.

Adopting a Privacy Blueprint process ensures that NEHTA proactively considers privacy compliance issues and promotes a coordinated approach to privacy management.

A clear description of an initiative is essential for a robust assessment of privacy risks. A Privacy Blueprint, however, cannot describe detailed aspects of project design. The design process is dynamic, responding to issues that arise from privacy analysis (such as the issues contained in this *Blueprint* and the feedback received), or new requirements that arise as an initiative develops. Likewise, a Privacy Blueprint is a living document, subject to further change and refinement.

National E-Health Transition Authority

In order to put management strategies into practice, a Privacy Blueprint describes a plan of action for addressing privacy. This plan includes:

- Identifying privacy issues and risks;
- Developing strategies for privacy management;
- Undertaking privacy impact assessments; and
- Developing ongoing privacy management tools (such as policies and information notices, etc).

This *Blueprint* ensures that privacy is properly integrated into the UHI Service design and implementation, as well as being a critical mechanism for consultation on the UHI Service.

The *Blueprint* outlines the nature and function of the UHI Service, and identifies key participants in the proposed system as well as the information involved and how it will be used.

A number of key privacy issues are then examined in detail, such as consent and notice, access, audit and secondary uses. These areas require consultation before the UHI Service can undergo a full privacy impact assessment or progress to implementation. The *Blueprint* aims to identify community concerns about these issues by using a series of specific questions within the discussion to elicit useful feedback. Such feedback will be incorporated into NEHTA's ongoing management of privacy issues and will inform future consultation documents and privacy policy decisions.

NEHTA's approach to consultation and intended next steps in managing privacy issues – including undertaking a full privacy impact assessment process - are then outlined.

Next Steps Defined

The *Blueprint* outlines NEHTA's ongoing consultation activities and the next steps for NEHTA's privacy analysis. These activities include undertaking a full Privacy Impact Assessment process, commencing in March 2007 and including extensive consultation; development of recommendations on consent, governance and complaints models; ongoing input from the clinician and consumer communities and the ongoing development of privacy policies and tools.

Further Information

The *Privacy Blueprint* is currently available for comment until **28 February 2007**, and can be found at www.nehta.gov.au. Individuals and organisations can provide feedback to NEHTA via:

Email: privacyblueprint@nehta.gov.au

Mail: Privacy Blueprint Feedback
UHI Service
NEHTA
Level 25, 56 Pitt Street
Sydney NSW 2000