



**Australian
Privacy
Foundation**

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The Hon Nicola Roxon MP
MG 50
Parliament House
Canberra ACT 2600

Dear Minister Roxon

Re: Individual Health Identifier (IHI) numbers

The Australian Privacy Foundation (APF) is the country's leading privacy advocacy organisation. I am writing in my capacity as Chair of the Health Sub Committee of the APF.

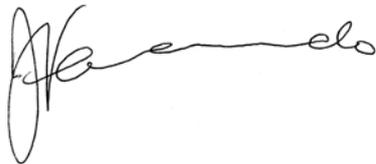
I refer to our correspondence of June 9 2009, where we requested your response to a number of concerns about Individual Health Identifier (IHI) numbers, the mooted national identification number. Two weeks ago we again contacted your office, by telephone this time, and were advised a response to our questions had been given an escalated priority. Consequently, I write to update our original list of concerns.

- Can you assure the public that the number will never be used for any secondary purpose at all (i.e. Workcare, the Transport Accident Commission, other insurance companies, banks, employers requiring a medical as part of the recruitment process)?
- How do you propose to enable extensions or changes to the function and use of the number by future governments?
- Why must the government have access to the IHI? The APF opposes the commonly understood information security threat afforded by storing all citizen numbers in a single data base regardless of whether it is distributed or not (policies for distributed data bases remain centralised).
- If a person is "mugged" and their Medicare card is stolen, can the number or health card be used in such a way as to add misinformation to an individual's electronic health record?
- How long will historical personal data be held (e.g. previous names and addresses)?
- How do you plan to protect the public against identity fraud?

- What risk and privacy frameworks have been established for the numbering of citizens?
- If an individual does not use, refer to or validate information linked to their IHI, will they be denied Medicare support or access to services from GPs and other providers as has occurred in the UK?
(<http://www.computerworlduk.com/management/government-law/publicsector/news/index.cfm?newsid=15042>)?
- How does the government plan to evaluate the IHI implementation in terms of ROI and improved patient care outcomes?
- A stakeholder meeting in Melbourne a couple of months ago indicated that bulk downloads of patient IHI's are already taking place where health practices know their patients' Medicare numbers. Is this the case?
- A recent plenary address by the CEO of NEHTA suggested that the Australian government may not devise a shared individual electronic health record, rather several private companies would be **contracted** and authorised to devise a personal health record (PHR). There was no mention of cost to the consumer. However the speaker did suggest that as consumers used more than a single PHR, then their health information would be indexed in such a way as to integrate **all** of the records. Is this the case?

E-health records benefit some patients, especially the chronically ill. However the APF is worried a faulty e-health implementation and the failure to address privacy, and so trust, in a systematic and respectful way may encourage further doubts about shortcomings linked to e-health initiatives more generally, especially as has occurred overseas. Hence, we look forward to your response to our questions.

Yours sincerely



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