



**Australian  
Privacy  
Foundation**

<http://www.privacy.org.au>

[Secretary@privacy.org.au](mailto:Secretary@privacy.org.au)

<http://www.privacy.org.au/About/Contacts.html>

5 August 2010

CEO  
Alfred Health

Dear Sir / Madam

**Re: 'Apple a day for doctors'**

The Australian Privacy Foundation (APF) is the country's leading privacy advocacy organisation. A brief backgrounder is attached.

Inappropriate behaviour in relation to patient privacy is a major impediment e-health initiatives. The APF has been actively working with a variety of organisations in an endeavour to achieve positive outcomes and avoid public backlash and project failures. The APF's policy statements on eHealth matters are provided as separate documents.

The APF understands from an article published in The Melbourne Age of 30 July, entitled 'Apple a day for doctors', that 500 iPads are to be provided to graduate doctors and nurses. Health Minister Daniel Andrews is quoted as saying that "The iPads will allow doctors and nurses to access any web-enabled application run by their hospital as they move around the hospital, as well as allowing them to tap into health information resources".

The APF appreciates the risks involved in relying on a newspaper article; and it is very supportive of appropriate application of technology in order to improve health care outcomes. However, the media report gives rise to many questions. For example:

1. The story indicates that the pilot program is a clinical trial involving human participants in the research. The National Health and Medical Research Council Statement on the Ethical Conduct of research "conducted with or about people, or their data or tissue" must comply with Government regulatory policies and requirements as devolved to a Human Ethics Research Committee (HREC).

Has the study been authorised by the relevant HREC?

If so, would you please provide us with the authorisation number and/or a copy of the document?

2. APF understands that many of the staff involved are academic-clinicians and are staff of both Alfred and Monash University. APF further understands that Monash uses Google as its email-provider.

What consideration has been given to the proprietary nature of both the Apple and Google services and data formats, and the data security aspects of the services, in the context of interoperable information sharing?

3. The newspaper story does not refer to a Privacy Impact Assessment (PIA). A PIA is vital, given the sensitive nature of Personal Health Records, the substantial increase in access to sensitive personal data that this scheme may entail, the proprietary nature of the technology, and the apparent involvement of at least two organisations and their outsourced service providers.

Has a PIA been conducted?

If so, would you please provide us with a copy of the PIA Report?

If not, would you please advise who is conducting it and what consultative processes have been included, with which representative and advocacy organisations?

Thank you for your consideration.

Yours sincerely

A handwritten signature in black ink, appearing to be 'Roger Clarke', written over a faint, dotted rectangular box. The signature is somewhat stylized and overlaps the box.

Roger Clarke  
Chair, on behalf of the Board of the Australian Privacy Foundation  
(02) 6288 1472                      Chair@privacy.org.au

## **Australian Privacy Foundation**

### **Background Information**

The Australian Privacy Foundation (APF) is the primary national association dedicated to protecting the privacy rights of Australians. The Foundation aims to focus public attention on emerging issues that pose a threat to the freedom and privacy of Australians. The Foundation has led the fight to defend the right of individuals to control their personal information and to be free of excessive intrusions.

The APF's primary activity is analysis of the privacy impact of systems and proposals for new systems. It makes frequent submissions to parliamentary committees and government agencies. It publishes information on privacy laws and privacy issues. It provides continual background briefings to the media on privacy-related matters.

Where possible, the APF cooperates with and supports privacy oversight agencies, but it is entirely independent of the agencies that administer privacy legislation, and regrettably often finds it necessary to be critical of their performance.

When necessary, the APF conducts campaigns for or against specific proposals. It works with civil liberties councils, consumer organisations, professional associations and other community groups as appropriate to the circumstances. The Privacy Foundation is also an active participant in Privacy International, the world-wide privacy protection network.

The APF's Board comprises professionals who bring to their work deep experience in privacy, information technology and the law.

The following pages provide access to information about the APF:

- papers and submissions <http://www.privacy.org.au/Papers/>
- resources <http://www.privacy.org.au/Resources/>
- media <http://www.privacy.org.au/Media/>
- Board-members <http://www.privacy.org.au/About/Contacts.html>

The following pages outline several campaigns:

- the Australia Card (1985-87)  
<http://www.privacy.org.au/About/Formation.html>
- the Medicare Smart Card (2004-06)  
[http://www.privacy.org.au/Campaigns/ID\\_cards/MedicareSmartcard.html](http://www.privacy.org.au/Campaigns/ID_cards/MedicareSmartcard.html)
- the Human Services Card (2005-06)  
[http://www.privacy.org.au/Campaigns/ID\\_cards/HSCard.html](http://www.privacy.org.au/Campaigns/ID_cards/HSCard.html)
- the Australia Card Mark II (2005-06)  
[http://www.privacy.org.au/Campaigns/ID\\_cards/NatIDScheme.html](http://www.privacy.org.au/Campaigns/ID_cards/NatIDScheme.html)
- the 'Access Card' (2006-07)  
[http://www.privacy.org.au/Campaigns/ID\\_cards/HSAC.html](http://www.privacy.org.au/Campaigns/ID_cards/HSAC.html)