Digital Health Security Tools and Resources

Webinar Handout – September/October 2019

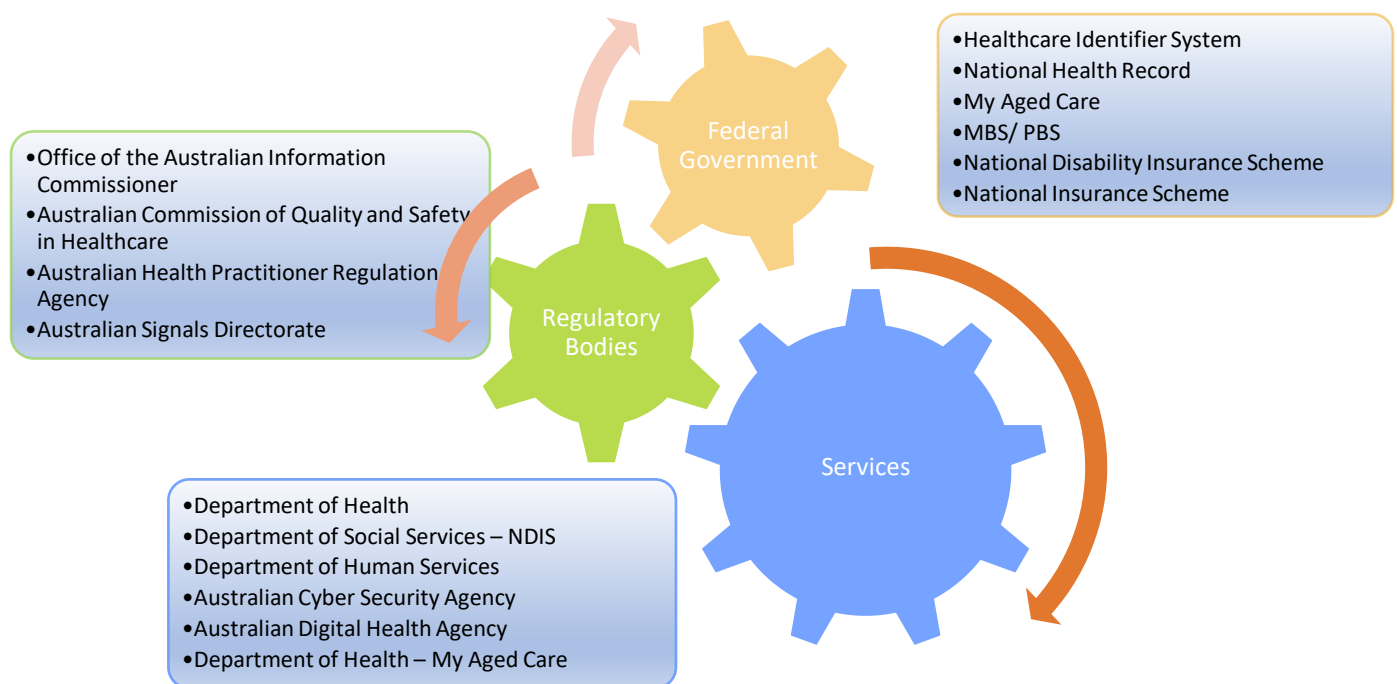## Digital Health Information Security

This webinar covered the following points:

- Who or what drives the system?
- Key themes emerging in all services
- National Agencies

Resource locations:

- Office of the Australian Information Commissioner
- Australian Cyber Security Services
- Australian Digital Health Agency
- Royal Australian College of General Practice

Who or what drives the system?

- Office of the Australian Information Commissioner
- Australian Commission of Quality and Safety in Healthcare
- Australian Health Practitioner Regulation Agency
- Australian Signals Directorate

Federal Government

- Healthcare Identifier System
- National Health Record
- My Aged Care
- MBS/ PBS
- National Disability Insurance Scheme
- National Insurance Scheme

Regulatory Bodies

Services

- Department of Health
- Department of Social Services – NDIS
- Department of Human Services
- Australian Cyber Security Agency
- Australian Digital Health Agency
- Department of Health – My Aged Care

Legislation and policies, Standards and Accreditation, Services and Workflow are all part of our Healthcare System. The cogs of regulation provide direction to the Federal Government on the governance and legislation required for appropriate Healthcare services.

The policies and legislation relating to the protection and use of health information are based upon legal review, clinical safety and ethical governance.

The Office of the Australian Information Commissioner is now the key source and direction on the management of Health Information.

Key themes emerging in all services

- Identifiable information requires secure storage
- Consumers have access to their own information
- Consent is required to share and or retain identifiable information
- Misuse or inappropriate access to health information is illegal
- Access to health information must be monitored
- To gain access you must be currently registered as a provider
- Access to health information is for clinical care – unless other consent is sought.

As with Occupational Health and Safety Representatives at each organisation, each Healthcare Organisation needs a **Responsible Officer** to manage Health Information, it's storage, accessibility and security.

National Agencies

Agency	Role	Relevance
Office of the Australian Information Commissioner OAIC	independent national regulator for privacy and freedom of information.	Australian Privacy Principles Notifiable Data Breaches scheme
Australian Commission on Quality and Safety in Healthcare	to ensure people are kept safe when they receive health care.	National Safety and Quality Health Service Standards Accreditation …….
Australian Health Practitioner Regulation Agency	manages the registration and renewal processes for health practitioners and students around Australia.	Health Provider Registration National Standards
Australian Signals Directorate	the hub for private and public sector collaboration and information-sharing, to prevent and combat cyber security threats and to minimise harm to all Australians.	Australian Cyber Security support Rules for data storage and protection
Australian Digital Health Agency	responsible for national digital health services and systems, with a focus on engagement, innovation and clinical quality and safety.	Common coding Standards for electronic records

Office of the Australian Information Commissioner

https://www.oaic.gov.au/

The office has a strong focus on Healthcare Providers, including industry specific recourses and a new guide was produced on October 8, 2019.

Also noteworthy is the following excerpt from the Commissioner:

Over the past three years, health service providers have consistently been one of the top three sources of privacy complaints to the OAIC. They have also been the leading source of notifiable data breaches since mandatory notification started in February 2018.

Australian Information Commissioner and Privacy Commissioner Angelene Falk said the guide brings together a wide range of OAIC advice for all health service providers covered by the Privacy Act 1988.

"I expect health service providers to be familiar with their privacy obligations and to take all reasonable steps to protect the personal information they are entrusted with," Commissioner Falk said.

"This includes any organisation who provides a health service and holds health information, from a doctor or private hospital through to a dentist, gym or childcare centre.

Commissioner Falk urged health service providers to use the guide to improve their privacy practice.

Resources available on the OAIC website:
- Notifiable Data Breach scheme reporting mechanism
  - Available to both Consumer and Healthcare Providers
  - Please note the accessibility of the mechanism for complaints to be made by consumers
  - https://www.oaic.gov.au/privacy/notifiable-data-breaches/report-a-data-breach/
- Access to Australian Privacy Principles guidelines
  - Please note the NEW GUIDE – released September 2019
  - https://www.oaic.gov.au/privacy/guidance-and-advice/guide-to-health-privacy/
- Privacy information for Health Service providers
  - https://www.oaic.gov.au/privacy/privacy-for-health-service-providers/
- Check out the Training Resources and test your current Privacy awareness with the Privacy Challenge:
  - https://www.oaic.gov.au/s/privacy-challenge/
- Privacy in your state: https://www.oaic.gov.au/privacy/privacy-in-your-state/

Australian Commission on Quality and Safety in Health Care

https://www.safetyandquality.gov.au/

The Australian Charter of Healthcare Rights

- Patient Reported Outcome Measures PROMS
  - https://www.safetyandquality.gov.au/our-work/indicators-measurement-and-reporting/patient-reported-outcomes/about-proms
- National Safety and Quality Health Care Standards
  - https://www.safetyandquality.gov.au/standards/nsqhs-standards
- Communicating for Safety Standard
  - https://www.safetyandquality.gov.au/standards/nsqhs-standards/communicating-safety-standard
- Partnering with Consumers Standard
  - https://www.safetyandquality.gov.au/standards/nsqhs-standards/partnering-consumers-standard

Australian Signals Directorate and the Australian Cyber Security Agency

https://www.asd.gov.au/cyber

Renamed in 2013, the Australian Signals Directorate bridges both the government and healthcare sector due to the diligence and importance of protecting health information. The Australian Cyber Security Agency is the working arm of the Directorate in this engagement with the Australian Digital Health Agency and the protection of the National Health Record.

Healthcare Organisation information can be sourced from: https://www.cyber.gov.au/

- Latest threat advice, phone scams, Malware threats

- Report Cyber issues

- Check out the Cyber Security Small Business Program

  - https://www.cyber.gov.au/programs/cyber-security-small-business-program

We recommend you review the advice on Remote Desktop usage, Bring Your Own Devices (BYOD) and potential threats when connecting to Public WiFi.

Australian Digital Health Agency – ADHA

Resources available on the https://www.digitalhealth.gov.au/ website:
- Home page access to the Digital Health Tools and Resources
- Digital Health Cyber Security Centre
- General Security Advice
- My Health Record – managing your security and privacy controls
- Stay Smart Online – register to receive updates.

RACGP – Resources for General Practices

Resources available on the https://www.racgp.org.au/ website:

- Information security in General Practice Handbook
- Confidentiality agreement template
- Internet and email policy template
- Privacy of Health Information – Handbook
- Patient Privacy template

Resources available on the Technology tab under Running a Practice:

- Clinical Technology
- Business Technology
- Activities and events (including Webinars)

Policy Checklist – For Clinical Care Legislation Checklist

The below policies are required in any Healthcare Provider Organisation for the collection, use and sharing of health information for clinical care. Please note that there are additional documents required for the Secondary use of Health Information:

- Patient Privacy Policy
- Confidentiality agreements for Providers
- Confidentiality agreements for Administration and Support staff
- My Health Record Policy
- Internet and email policy
- Notifiable Data Breach Scheme policy

Copies of these can be found on the RACGP website. If you would like templates, but cannot find them please contact digital.health@countrysaphn.com.au

Legislation Checklist

Copies of these Legislative Acts relate to the policies you are required to keep. An online copy is recommended to be kept in your accreditation folder.

- Australian Privacy Principles
- Freedom of Information Policy
- Health Practitioner Law Regulation 2018
- My Health Record Act 2012
- Healthcare Identifier Act 2012

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