



7 August 2015

Mr Dimitrios Kormas
Adviser
Regulation and Strategy
Office of the Australian Information Commissioner
Email: Dimitrios.Kormas@oaic.gov.au

Dear Mr Kormas,

Re: OAIC consultation – Guide to developing a data breach response plan

The Royal Australian College of General Practitioners (RACGP) thanks the Office of the Australian Information Commissioner (OAIC) for the opportunity to provide comment on the OAIC's draft *Guide to developing a data breach response plan (the Guide)*.

As you will be aware, the RACGP provides privacy resources to its members and has kept these resources updated in response to changes to the Privacy Act and introduction of new Australian Privacy Principles. The RACGP provides the following comments on the draft Guide:

- The RACGP suggests that the document be more succinct and focus on key points with relevant supporting information in an accompanying appendix.
- The document contains information that is useful for larger organisations. The RACGP proposes that a shorter version specifically tailored for general practices (or one more focussed for small businesses) would be more appropriate. This could be accompanied by a slightly modified version of the checklist suitable for general practices. The document in its current form will not likely be used by general practices.
- The RACGP's *Computer Information and Security Standards 2nd edition* are designed to assist general practices and other office-based healthcare organisations meet their professional obligations in computer and information security, including guidance for data breach response and recording. The RACGP suggests the Guide links to these standards. This resource is available at: <http://www.racgp.org.au/your-practice/ehealth/protecting-information/ciss/>. These standards can be used in conjunction with the OAIC guide to assist general practitioners and other office-based healthcare organisations.

The RACGP will be pleased to work with the OAIC to assist with the development of informative privacy resources for healthcare providers and consumers. Please do not hesitate to contact Ms Joanne Hereward, Program Manager - eHealth at (03) 8699 0338 or joanne.hereward@racgp.org.au if you have any questions or comments.

Yours sincerely

Dr Frank R Jones
President