

14 February 2023

Mr Martin Fletcher
Chief Executive Officer
Australian Health Practitioner Regulation Agency
GPO Box 9958
Melbourne VIC 3001

Via email: AhpraConsultation@ahpra.gov.au

Dear Mr Fletcher

The Royal Australian College of General Practitioners (RACGP) thanks the Australian Health Practitioner Regulation Agency (Ahpra) for the opportunity to provide input on the draft Data strategy. The RACGP is supportive of measures that balance the utilisation of data to benefit the public and practitioners with data protection and privacy.

The RACGP is Australia's largest professional general practice organisation, representing over 43,000 members working in or toward a career in general practice including four out of five general practitioners (GPs) in rural Australia.

The proposed draft Data strategy, while covering some issues well, lacks detail and does not sufficiently address ongoing concerns around privacy and confidentiality protections. Despite multiple large-scale data breaches in recent months, the strategy makes a limited attempt to consider the liability that holding large amounts of personal and sensitive information imposes on the organisation.

The draft Data strategy also does not address the lack of data interoperability across healthcare systems in Australia. To create system interoperability there must also be support, infrastructure and training, alongside overarching strategic documents. It is unclear how impactful this draft Data strategy and associated actions will be without broader measures to address interoperability and alignment of data systems in health more broadly.

Detailed feedback on the draft Data strategy is provided at Appendix A.

The RACGP welcomes further opportunities to engage with Ahpra on its ongoing data approach. If you have any queries regarding this submission, please contact Michelle Gonsalvez, National Manager – Funding and Health System Reform, on (03) 8699 0490 or via michelle.gonsalvez@racgp.org.au.

Yours sincerely



Dr Nicole Higgins
President