



Canberra Health Services Consultation Paper

Health Information Services
Privacy and Compliance Manager
Chief Financial Officer Group

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1. Introduction

Canberra Health Services (CHS) is focussed on the delivery of high quality, effective, person-centred care. It provides acute, sub-acute, primary, and community-based health services to the Australian Capital Territory (ACT)—a catchment of approximately 400, 000 people. It also services the surrounding Southern New South Wales region which includes the Bega Valley, Bombala, Cooma-Monaro, Eurobodalla, Goulburn, Mulwaree, Palerang, Queanbeyan, Snowy River, Upper Lachlan Shire, and the Yass Valley.

CHS administers a range of publicly funded health facilities, programs and services including but not limited to:

- **The Canberra Hospital:** a modern 600-bed tertiary hospital providing trauma services and most major medical and surgical sub-specialty services.
- **University of Canberra Hospital Specialist Centre for Rehabilitation, Recovery and Research:** a dedicated and purpose-built rehabilitation facility, with 140 inpatient beds, 75-day places and additional outpatient services.
- **Mental Health, Justice Health, Alcohol and Drug Services:** provide a range of health services from prevention and treatment through to recovery and maintenance at a number of locations and in varied environments for people suffering from mental health issues.
- **Dhulwa Secure Mental Health Unit:** a purpose designed and built facility providing clinical programs and treatment options for people suffering from acute mental health issues.
- **Six community health centres:** providing a range of general and specialist health services to people of all ages.
- **Three Walk-in Centres:** which provide free treatment for minor illness and injury.
- A range of **community-based** health services including early childhood services, youth and women's health, dental health, mental health and alcohol and drug services.

CHS is a partner in teaching with the Australian National University, the University of Canberra, and the Australian Catholic University.

On 1 October 2018 ACT Health transitioned into two separate organisations being the ACT Health Directorate (ACTHD) and Canberra Health Services (CHS).

To enable CHS to have a strong focus on operational effectiveness, efficiency, and accountability in the health services we provide, CHS is proposing a realignment of functions.

The [current organisational chart](#) and the recent [Annual Report](#) and the ACT Government [Budget Papers](#) provide more detail about CHS.

2. Purpose

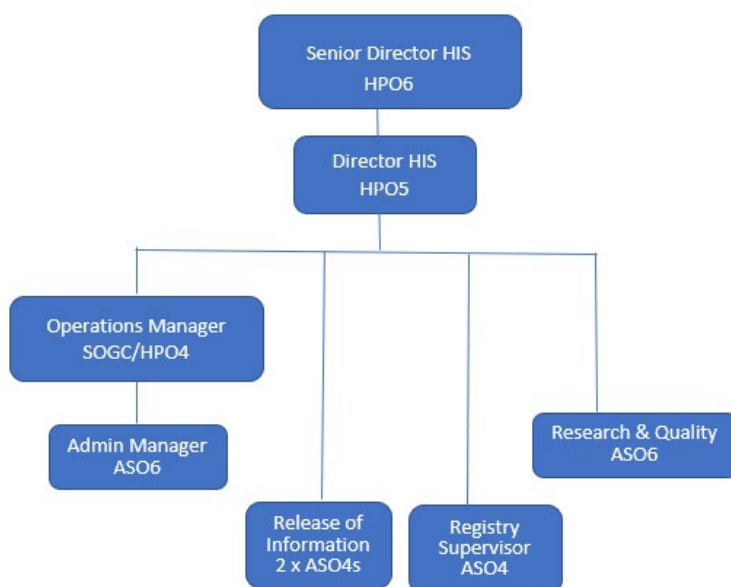
The purpose of this paper is to provide information to HIS staff of the creation of a Privacy and Compliance Manager role within Health Information Services (HIS) and the associated reporting line changes and implications for the HIS Release of Information team. The following document outlines the consultation process for the implementation of a Privacy and Compliance Manager role.

The HIS Privacy and Compliance Manager role will:

- Provide high level operational advice and manage the day-to-day functions of the ROI process across CHS to ensure compliance with the obligations of the Health Records (Privacy and Access) Act 1997 and other relevant legislation and legal statutes.
- Management of the release of information team, including the Mental Health Justice Health Alcohol and Drug Services (MHJHADS) team who are being transferred to HIS.
- Evaluation of the ROI processes and responsibility for training ROI concepts for CHS
- Undertake privacy audits and subsequent investigations with staff to monitor CHS staff are abiding by appropriate use/access of personal health information.
- Investigate complaints related to health records and alleged breaches of privacy or misconduct in relation to personal health information, collaborate with relevant Divisions and People and Culture and complete associated reports and briefs as necessary.
- Explore electronic privacy tools such as Secure Address and Break the Glass, and access options including MyDHR, DHR Link and proxy access, within the current digital health record application, and provide expert advice and recommendations as required.

3. Current model

The HIS Release of Information team currently comprises of 2 FTE ASO4s, who report directly to the HPO5 Director HIS:



The staff in the ROI team are responsible for the following duties:

- Exercise a high level of understanding and interpretation of the privacy legislation and assess each request for information from the patient clinical record against these privacy requirements.
- Register all requests for information received, and action within the appropriate legislated time frames; liaise with internal and external stakeholders; obtain appropriate authorisation and payments, review records for exemption criteria; locate and retrieve all relevant clinical records; assist other team members when necessary.
- Perform administrative and reception duties to support Health Information Services by attending to front counter, telephone, and written enquiries as necessary.
- Ensure patient confidentiality is always maintained whilst providing high quality customer service as outlined in the Customer Service Standards.

4. Rationale for change

The Privacy and Compliance Manager role is being introduced into HIS as there are several changes occurring within the ROI team:

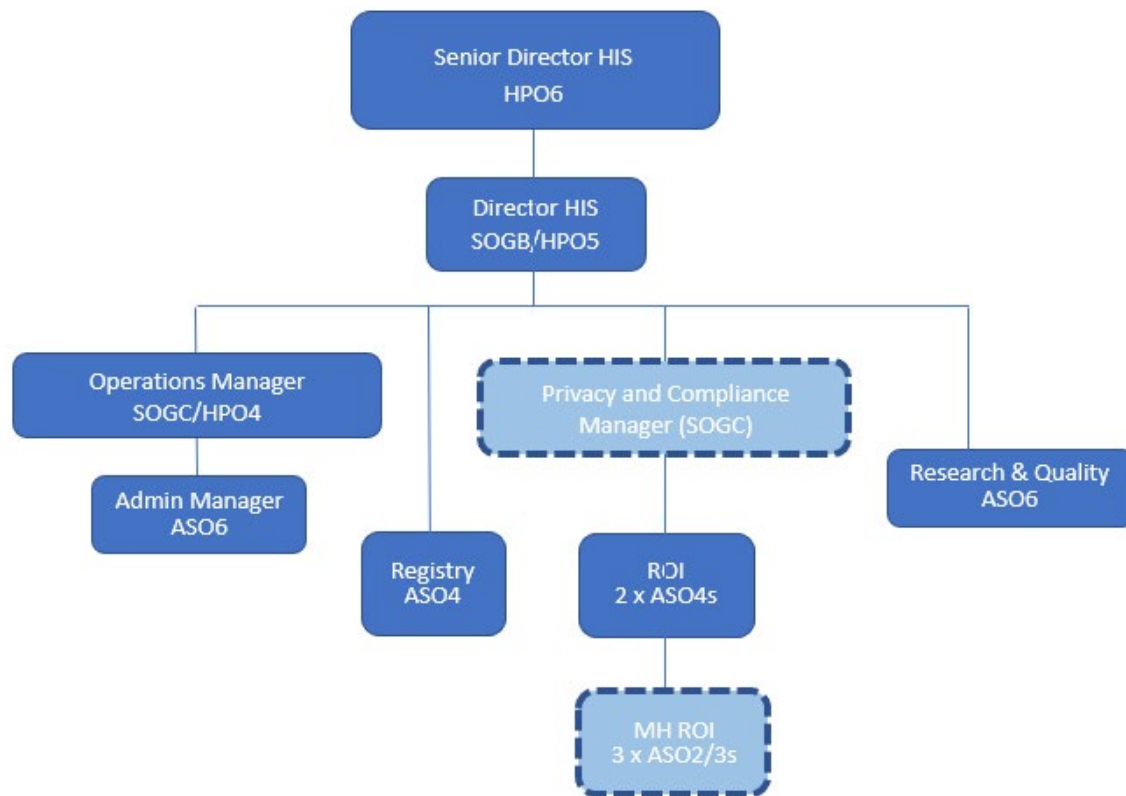
- The implementation of the DHR has provided an opportunity to centralise the ROI across CHS. This will ensure that CHS has a standardised approach to ROI. This involves the transition on the MHJHADS ROI team to be managed by HIS (as of the 30 June 2023).
- The DHR has also create a significant need for privacy and compliance audits to ensure that the clinical record is being accessed and utilised appropriately.
- There is an increased awareness in the community of the ability for clinicians to access their record as well as the ability for the community to see which clinicians have accessed their records. This has resulted in an increase of investigations on appropriate use.
- DHR has several tools that can be utilised to add different layers of confidentiality and there is now a requirement for HIS to have an advisory role and expertise in this space for CHS.

The Privacy and Compliance Manager role will coordinate and complete these activities.

5. Future model

5.1. Scope of the future model

The future model will involve the ROI team reporting to the Privacy and Compliance Manager (including the MHJHADS ROI team) and ensure that audit and compliance processes are introduced into the department.



5.2. Benefits of the future model

The introduction of Privacy and Compliance Manager role will allow a concentrated effort on aligning the ROI processes across CHS and the introduction of formal audit and compliance activities. The introduction of the Privacy and Compliance Manager role will give the HIS:

- *Greater scope for leave coverage and additional training*
- *Further support to ensure HIS team embrace the DHR and continues to embody the CHS values progressive, innovative, respectful and kind*
- *Introducing an additional layer between the ASO4s and the HPO5, this allows for career progression and leave coverage*

5.3. Implementation of the future model

Implementation of the Privacy and Compliance Manager will involve:

- Completion of the consultation process (this paper and feedback process)
- Advertising and recruitment of the Privacy and Compliance Manager role
- Once the position is recruited to the successful applicant will commence in the department and take responsibility for the ROI team (including MHJHADS ROI team)

5.4. Related change processes

The implementation of the DHR has created a significant workflow transformation within HIS. Many of the administrative roles carried out by HIS staff have been designed around paper record management. These functions will be transformed into digital record management tasks.

HIS staff have been assured that no permanent officers will lose their jobs, however, the way they perform their roles may change. HIS are still responsible for managing clinical records and personal health information and it will now be required to be managed in line with the new electronic system which much of the work being increasingly driven by DHR Workqueues.

Any further changes required in the HIS department will be part of separate consultation processes.

6. Consultation methodology

The purpose of this paper is to provide information to HIS staff of the creation of the Privacy and Compliance Manager role within Health Information Services (HIS) and the associated reporting line changes and implications for the ROI team. This document outlines and seeks feedback to progress to the implementation of the new role.

There are still details that need to be determined and your feedback, suggestions and questions will assist in further refining the proposal.

Feedback can be provided via email to kerri.mcgufficke@act.gov.au

Feedback is due by 23 June 2023.

We are seeking responses to the following questions:

1. Do you have any concerns about the proposal so far, if so what are they?
2. Do you have any other feedback you would like to be considered in relation to the Privacy and Compliance Manager role?

For any further information relating to the creation of a Privacy and Compliance role within Health Information Services (HIS) and the associated reporting line changes and implications for the ROI team and subsequent consultation process, please contact:

- Your supervisor directly, or
- Kerri McGufficke at kerri.mcgufficke@act.gov.au