



IRISH MEDICAL
ORGANISATION
Ceardchumann Dochtúirí na hÉireann

Irish Medical Organisation Submission to the Health Service
Executive (eHealth Ireland) on the

Privacy Impact Assessment for the Individual Health Identifier

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Question 1: Are all the benefits of the IHI (Individual Health Identifier) clear to you?

Yes

No

Not Sure

Are there any other benefits of the IHI that we should include?

The benefits of an IHI system are clear.

Question 2: Have we identified all the privacy risks for the IHI?

Yes

No

Not Sure

Are there any other privacy risks for the IHI that we should include?

The risk of the public losing trust in how the IHI business service operates and how the IHI register is used and managed is recognised within the draft Privacy Impact Assessment. There is no risk identified, however, regarding any loss in confidence that healthcare practitioners may experience in the system and its operation, and how such a loss could be managed or mitigated. Given their crucial role in operating an IHI system, such a risk should be assessed.

Risks associated with the use of Individual Health Identifiers by healthcare providers outside of the state to reference patient records held by healthcare providers in Ireland are not adequately referenced within this draft.

This draft also fails to countenance the risks associated within incorrect information being transferred from trusted data sources, other than the creation of duplicate entries. Such information that incorrectly appears on a patient's IHI could lead incorrect representations of their age, family status, or clinical background.

It is also unclear on what basis the probability and impact ratings contained in this draft were determined, or on what basis the envisaged mitigation of these probabilities and impacts by the proposed safeguards or controls is determined. If resource allocation or policy decisions are made on the basis of these probability and impact ratings, they must be founded on a robust evidence-base.

Question 3: Have we identified sufficient safeguards for protecting your information in the IHI?

Yes

No

Not Sure

Are there any other safeguards for IHI that we should include?

In relation to Privacy Issue No. 1, which relates to the illegal access of personal information, it is difficult to see why the HIQA Information Governance and Management Standard for the

Health Identifiers Operator in Ireland No. 3.1 is not expressly referenced in the draft, which provides that the health identifiers operator maintains and reviews the privacy of health identifier records contained in the national registers, and is therefore of direct relevance.

It is crucial that effective resources are put in place, both financial and human, to ensure the highest level of security is afforded to processed data. This should mean that the most up to date technology is utilised in the encryption and safeguarding of data, and that suitably trained persons are employed for the purposes of maintaining and reviewing ongoing privacy and security arrangements.

Data protection requires continuous and structured reviews of security arrangements, a commitment to use of the latest and most advanced security technologies, an identified person who has overall responsibility for the auditing, improvement, and maintenance of systems utilised in the protection of all data processed by the health identifiers operator, and recruitment strategies that aim to ensure the employment of persons with appropriate experience, qualifications, and skills to guarantee the safeguarding of personal data must be utilised.

The IHI record contains numerous articles of sensitive information, therefore it is important that a highly restrictive approach is taken to the accessing of this record, and its components, to reduce the risk of a data breach or inappropriate access occurring.

Given that a PPSN will form a part of the IHI record, significant cooperation is required between the IHI operator and the Department of Social Protection, and other relevant bodies, to ensure that no privacy or security risks arise from access to PPSNs.