

**From:** [Vanessa Halter](#)  
**To:** [Consultation](#)  
**Cc:** [Larissa Briedis](#)  
**Subject:** RE: OAIC consultation on revised PCEHR Enforcement Guidelines [SEC=UNCLASSIFIED]  
**Date:** Tuesday, 3 November 2015 1:45:00 PM

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Dear Katerina

Thank you for the opportunity to provide comment to the revised *PCEHR (Information Commissioner Enforcement Powers) Guidelines*.

NEHTA supports updating the Guidelines to reflect changes to the Privacy Act and to ensure consistency with the OAIC's recently published regulatory guidance, particularly given:

- the growth in the adoption and use of the national eHealth record system; and
- the need for the Guidelines to remain relevant into the future.

As at 22 October, there were 2,427,704 consumers registered with the national eHealth record system, and a total of 7,970 healthcare organisations registered. This includes 208 hospitals and 5,182 general practices.

The continued growth in consumers and participants necessitates that the Guidelines remain up-to-date. Indeed, this is particularly the case given the move toward an opt-out system, with the opt-out trials in Far North Queensland and the Nepean-Blue Mountains region increasing the number of registered consumers by close to one million.

NEHTA supports the OAIC's review of all eHealth guidance, not solely these Guidelines, on a periodic basis.

Kind regards, Vanessa

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