



16 September 2019

Our File Reference: FOI.1811002

Julie via Right to Know

[foi+request-4942-e008b563@righttoknow.org.au](mailto:foi+request-4942-e008b563@righttoknow.org.au)

Dear Julie,

**Your Freedom of Information Request No: 1811002**  
**Notice of Decision**

The purpose of this letter is to give you a decision about access to documents that you requested under the *Freedom of Information Act 1982* (the FOI Act).

**Summary**

I, Bettina McMahon, am an officer authorised under section 23(1) of the FOI Act to make decisions in relation to FOI requests and this letter sets out the decision on your request for access.

On 9 November 2018 you requested access to a document or documents held by the Australian Digital Health Agency (the Agency) under the FOI Act relating to Agency Senate Estimates Briefs documents.

In your FOI request you sought access to:

‘In SoR issued 1 November 2018, for Application Number 1810003, the Australian Digital Health Agency (ADHA) referred to, and extracted some points from, briefs/documents prepared for ADHA’s representatives to use at the recent Senate Estimates hearings.

I request, under FOI, copy of these briefs. While some of the contents would have been repeated by those subject to questioning by the Senate Estimates Committee, not everything briefed on gets said, as it is decided by what the Committee members ask, not what those being questioned wish for.

I note that as briefing material for Senate Estimates is all prepared on the basis it may be stated during these public proceedings, clearance for FOI release should be reasonably straightforward, and given the recency of Senate Estimates, should be able to be quickly located.’

I have taken your request to be for:

‘Australian Digital Health Agency (the Agency) Senate Estimates Briefs documents prepared for the Agency’s appearance at the Senate Supplementary Budget Estimates Hearing, Senate Community Affairs Legislation Committee, Wednesday, 24 October 2018’.

On 4 December 2018 the Agency issued a charge notice.

On 6 December 2018 you contested the charges and the Agency responded on 11 December 2018 advising the charges would not be reduced or waived as you had not stated any financial hardship grounds or public interest grounds.

On 13 December 2018 you applied for an external review by the Office of the Australian Information Commissioner (OAIC) of the Agency's decision to apply charges (MR18/00030 refers).

On 8 August 2019 the Agency issued a revised decision notifying agreement to waive the charge in the interest of resolving the related OAIC review.

### **Documents identified**

The Agency has identified 53 documents that fall within the scope of your request. I have decided to release these documents to you in part. The decision is set out in full at Attachment A: Schedule of Documents.

In addition to the briefs identified, witnesses appearing before Senate Estimates may also receive verbal updates on key information on the day of the hearing to ensure latest figures are available. I note that the Agency reporting to the 24 October 2018 Senate Estimates hearing on the number of individuals who had elected to opt out from having a My Health Record created referred to in FOI Application Number 1810003 is not contained within the identified briefs.

### **Material taken into account**

In making my decision, I had regard to:

- the terms of your application;
- the content of the documents to which you sought access;
- publicly available information;
- relevant provisions of the FOI Act (specifically sections 22, 33, 47B, 47C, 47E and 47G); and
- the guidelines published by the Office of the Australian Information Commissioner (OAIC) under section 93A of the FOI Act (the Guidelines).

### **Decision**

The schedule **indicates** the documents to which part access is refused. My reasons for refusing access are given below.

### **Exemptions**

#### ***Documents to which section 33 applies***

I have decided that some documents contain material that is exempt from disclosure under section 33 of the FOI Act as set out in the attached schedule.

Section 33 of the FOI Act relevantly states:

A document is an exempt document if disclosure of the document under this Act:

- (a) would, or could reasonably be expected to, cause damage to:
  - (i) ...;
  - (ii) ...; or
  - (iii) the international relations of the Commonwealth; or
- (b) would divulge any information or matter communicated in confidence by or on behalf of a foreign government, an authority of a foreign government or an international organization to the Government of the Commonwealth, to an authority of the Commonwealth or to a person receiving the communication on behalf of the Commonwealth or of an authority of the Commonwealth.

I found that the identified documents contain material in respect of which a claim for exemption under section 33 of the FOI Act is warranted.

In delivering on its purpose of better health for all Australians enabled by seamless, safe, secure digital health services and technologies, the Agency actively engages internationally to promote collaboration, including through establishment of the Global Digital Health Partnership (GDHP).

As part of that engagement, information is communicated confidentially as part of ongoing discussions with relevant government agencies from other countries to build collaboration across the international community. I consider that release of this information could reasonably damage future international relations and divulge information provided confidentially by international government agency and organisation representatives, thereby reducing the effectiveness of continuing collaboration to support the Agency deliver on its purpose.

### **Conditional exemptions**

#### ***Documents to which section 47B applies***

I have decided that some documents contain material that is partially exempt from disclosure under section 47B of the FOI Act as set out in the attached schedule.

Section 47B of the FOI Act states:

A document is conditionally exempt if disclosure of the document under this Act:

- (a) would, or could reasonably be expected to, cause damage to relations between the Commonwealth and a State; or
- (b) would divulge information or matter communicated in confidence by or on behalf of the Government of a State or an authority of a State, to the Government of the Commonwealth, to an authority of the Commonwealth or to a person receiving the communication on behalf of the Commonwealth or of an authority of the Commonwealth;

I found that the identified documents contain material in respect of which a claim for exemption under section 47B of the FOI Act is warranted.

All Australian governments have endorsed the *National Digital Health Strategy* and the Agency works with all state and territory governments to support progressing the priority areas for digital health under the Strategy.

As part of that engagement, information is communicated confidentially as part of ongoing discussions with relevant government agencies from all states and territories to design, build and implement digital health services and technologies. I consider that release of this information could reasonably damage future relations between the Agency and state and territory health agencies and divulge information provided confidentially by those state and territory agencies, thereby reducing the ability for the Agency to work with states and territories to implement a national digital health system.

In addition, it is likely that the disclosure of the documents would result in a loss of trust in the Agency by state and territory government agencies and could reasonably be expected to prejudice the future working relationship required to manage the My Health Record and other digital health priorities.

After determining that the documents are conditionally exempt in accordance with section 47B, I am required to consider the public interest test (section 11A(5) of the FOI Act).

### **Public interest considerations**

Conditionally exempt matter must be released unless, in the circumstances, access to that document at this time would, on balance, be contrary to the public interest (section 11A(5) of the FOI Act).

As the OAIC Guidelines state at paragraphs 6.7 to 6.9:

The term 'public interest' is necessarily broad and non-specific because what constitutes the public interest depends on the particular facts of the matter and the context in which it is being considered.

To conclude that, on balance, disclosure of a document would be contrary to the public interest is to conclude that the benefit to the public resulting from disclosure is outweighed by the benefit to the public of withholding the information.

The decision maker must analyse, in each case, where on balance the public interest lies, based on the particular facts of the matter at the time the decision is made.

In considering whether access to the documents would be contrary to the public interest, I have considered the factors favouring access in section 11B(3) of the FOI Act and the factors that are irrelevant and must not be taken into account in section 11B(4) of the FOI Act.

*Factors in favour of disclosure:*

Firstly, I have considered the following factors favouring disclosure, specifically that disclosure would:

- i) promote the objects of the Act, particularly in increasing scrutiny, discussion, comment and review of the Government's activities (section 3(2)(b) of the FOI Act);
- ii) inform debate on a matter of public importance; and
- iii) promote effective oversight of public expenditure.

I do not consider that the release of the documents would inform debate on a matter of public importance, nor would it promote effective oversight of public expenditure. The information contained in the documents relates ongoing engagement between the Agency and states and territories to inform implementation of digital health priorities. Broader consultation occurs on all digital health initiatives at the appropriate time.

*Factors against disclosure:*

Secondly, I have considered the following factors against disclosure, specifically that disclosure could:

- i) reasonably be expected to prejudice an agency's ability to obtain confidential and/or similar information in the future;
- ii) reasonably be expected to prejudice the management function of an agency; and
- iii) found an expectation that the Agency deals with information in a manner inconsistent with the standard reasonably expected of the Government in relation to health and other sensitive information.

In this case, I have formed the view that the disclosure of the information will make a negligible contribution to those factors in favour of disclosure. There is minimal public interest in this information being known. By contrast, the interference with the ability of the Agency to work effectively with state and territory governments to implement a national digital health system is, in my view, significant.

In accordance with section 11B(4)(b) of the FOI Act, I have not taken any irrelevant factors into account when making my decision.

I have concluded that disclosure would, on balance, be contrary to the public interest. Accordingly, I find that subsections 47B(a) and/or (b) exemptions apply in relation to the exempt material contained within the documents.

### ***Documents to which section 47C applies***

I have decided that some documents contain material that is partially exempt from disclosure under subsection 47C(1)(a) of the FOI Act as set out in the attached schedule.

Subsection 47C(1)(a) of the FOI Act states:

- (1) 'A document is conditionally exempt if its disclosure under this Act would disclose matter (***deliberative matter***) in the nature of, or relating to, opinion, advice or recommendation obtained, prepared or recorded, or consultation or deliberation that has taken place, in the course of, or for the purposes of, the deliberative process involved in the functions of:
  - (a) an agency ....'

I found that the identified documents contain material in respect of which a claim for exemption under section 47C(1)(a) of the FOI Act is warranted.

The redacted sections of the documents are deliberative in nature as the information expressed is about the Agency's deliberations to reach a position on delivery of its functions to support design, development and implementation initiatives of digital health initiatives. The documents contain information that does not reflect a finalised policy or procedural position within the Agency and are internal documents providing information so that the Agency may be guided in their decision-making processes with advice, methodologies and results from Agency officials and contracted organisations.

In addition, to the extent that the documents contain matter which has not been finalised within the Agency, the FOI Guidelines advise that intertwined information should be separated where possible, without diminishing or impairing the quality or completeness of the information. I have considered this advice, and, in these instances, I have separated the information that I can from the deliberative matter. The information that is deliberative has been redacted in these documents as it is likely to be taken out of context and be misleading.

In accordance with the decision in *Secretary, Department of Employment, Workplace Relations and Small Business and Staff Development Centre* (2001) 114 FCR 301, I have not exempted or redacted information that is purely factual or operational. As explained in the Office of the Australian Information Commission (OAIC) Guidelines at part 6.70 the 'exclusion of purely factual material under section 47C(2)(b) is intended to allow disclosure of material used in the deliberative process.' Where the section 47C exemption has been applied to parts of documents, those parts are deliberative in nature and show emerging views in advice and opinions of Agency officials.

After determining that the documents are conditionally exempt in accordance with section 47C, I am required to consider the public interest test (section 11A(5) of the FOI Act).

### **Public interest considerations**

The public interest test is as outlined above and the same factors in favour of and against disclosure apply as for the conditional exemption under section 47B of the FOI Act.

Disclosure of the deliberative material would facilitate the objects of the FOI Act, by providing the applicant with access to information held by the Commonwealth Government (the Government) and increasing scrutiny of the Government's activities. However, I consider that release of this information could reasonably obstruct the future development of advice and opinions of public servants from being honestly expressed, recorded and promulgated especially in relation to the My Health Record ecosystem.

It is also of equal importance that a level of integrity and confidence is maintained for the continued engagement with state and territory government agencies to the Agency. It is important that officers can give full and uncensored consideration to opinions and advice to the Agency. The ability and willingness of

officers to thoroughly keep records and consider all options would be adversely affected if parts of the documents could then be disclosed to the public and open matters not decided upon to debate and comment outside of official processes, especially before any final decisions are made. Therefore, it is reasonably foreseeable that allowing public access to parts of these documents would undermine the decision-making process of the Government.

In accordance with section 11B(4)(b) of the FOI Act, I have not taken any irrelevant factors into account when making my decision.

I have concluded that disclosure would, on balance, be contrary to the public interest. Accordingly, I find that the section 47C exemption applies in relation to the identified material contained within the documents.

***Documents to which section 47E applies***

I have decided that some documents contain material that is partially exempt from disclosure under subsections 47E(a) and (e) of the FOI Act as set out in the attached schedule.

Section 47E of the FOI Act states:

A document is conditionally exempt if its disclosure under this Act would, or could reasonably be expected to, do any of the following:

- (a) prejudice the effectiveness of procedures or methods for the conduct of tests, examinations or audits by an agency;
- (b) ...;
- (c) ...;
- (d) have a substantial adverse effect on the proper and efficient conduct of the operations of an agency.

For section 47E(a), I note that paragraph 6.104 of the OAIC Guidelines state that there must be prejudice to the effectiveness of tests, examinations and/or audits that is reasonably expected to occur following disclosure for the exemption to apply.

For section 47E(d), I note that paragraph 6.123 of the OAIC Guidelines state that any predicted substantial adverse effect must 'bear on the agency's proper and efficient operations, that is the agency is undertaking its expected activities in an expected manner'.

I have found that, in respect of section 47E(a), the Agency's operations would be markedly affected if the partially redacted information in the above documents were disclosed. The information regarding methods for testing, examination and auditing affects the security and integrity of the My Health Records system. It could potentially expose and weaken the Agency's data integrity capability into the future.

I have found that, in respect of section 47E(d), the Agency's operations would be markedly affected if the partially redacted information in the above documents were disclosed. The information regarding the Agency's arrangements for planning and delivery of specific arrangements for vulnerable populations, manage communications and engagement, maintain security and integrity of the My Health Records system, and manage the financial and service delivery aspects of its functions contained in these documents are such that, if it were released, the Agency's practises could be misconstrued, and some aspects of the data could be taken out of context.

It would undermine the Agency's ability to effectively manage its operations and undermine the confidence of Agency partners in continuing to work together to deliver a national digital health system.

In the case of both sections 47E(a) and (d), the authors of the information may limit the detail included in this material in the future, which would affect the Agency's ability to deliver on its legislative and operational functions.

After determining that the documents are conditionally exempt in accordance with subsections 47E(a) and/or (d), I am required to consider the public interest test (section 11A(5) of the FOI Act).

#### **Public interest considerations**

The public interest test is as outlined above and the same factors in favour of and against disclosure apply as for the conditional exemption under section 47B of the FOI Act.

Disclosure of the material relating to tests, examinations and audits, and around the operations of the Agency would facilitate the objects of the FOI Act, by providing the applicant with access to information held by the Commonwealth Government (the Government) and increasing scrutiny of the Government's activities. However, I consider that release of this information could reasonably obstruct the future development of the My Health Record system and delivery of other national digital health priorities.

It is also of importance that a level of integrity and confidence is maintained for the continued free flow of ideas and that data and operational platforms are protected. It is important that officers can give full and uncensored consideration to opinions, advice and outcomes when engaging in operational functionalities. The ability and willingness of officers to thoroughly consider all options would be adversely affected if the documents, or information within those documents, could then be disclosed to the public for debate and comment outside of official operational processes.

Therefore, it is reasonably foreseeable that allowing public access to some parts of these documents concerning the operations of the Agency would undermine the functioning of the Agency, its methodological processes and its conduct in discharging Commonwealth business.

In accordance with section 11B(4)(b) of the FOI Act, I have not taken any irrelevant factors into account when making my decision.

I have concluded that disclosure would, on balance, be contrary to the public interest. Accordingly, I find that the subsections 47E(a) and/or (d) exemptions apply in relation to the identified material contained within the documents.

#### ***Documents to which section 47G applies***

I have decided that some documents contain material that is exempt from disclosure under subsection 47G(1)(a) and (b) of the FOI Act as set out in the attached schedule.

Subsection 47G(1)(a) provides:

- (1) A document is conditionally exempt if its disclosure under this Act would disclose information concerning a person in respect of his or her business or professional affairs or concerning the business, commercial or financial affairs of an organisation or undertaking, in a case in which the disclosure of the information:
  - (a) would, or could reasonably be expected to, unreasonably affect that person adversely in respect of his or her lawful business or professional affairs or that organisation or undertaking in respect of its lawful business, commercial or financial affairs; or
  - (b) could reasonably be expected to prejudice the future supply of information to the Commonwealth or an agency for the purpose of the administration of a law of the Commonwealth or of a Territory or the administration of matters administered by an agency.

I find that the disclosure of the document would cause an unreasonable adverse effect on the business affairs of the third parties mentioned and that this information is not otherwise publicly available.

The operation of the business information exemption depends on the effect of disclosure rather than the precise nature of the information itself, however, I am satisfied that the information in question has some relevance to a class of people in respect of their business or professional affairs or to the business, commercial or financial affairs of organisations or undertakings.

The documents contain information that is not widely known. This information was provided by the businesses and organisations as part of their role in contributing to the creation and maintenance of the My Health Record system.

There is a reasonable expectation that the disclosure of the information contained in the documents would unreasonably affect the third parties in respect of their lawful business affairs to the extent that this could affect the abilities of the third parties to work with the Agency in the future.

In addition, it is likely that the disclosure of the information contained in the documents would result in a loss of trust in the Agency by the third parties and could reasonably be expected to prejudice the future supply of information to the Agency in relation to its functions with the My Health Record and other national digital health priorities.

After determining that the documents are conditionally exempt in accordance with subsections 47G(1)(a) and/or (b), I am required to consider the public interest test (section 11A(5) of the FOI Act).

#### **Public interest considerations**

The public interest test is as outlined above and the same factors in favour of and against disclosure apply as for the conditional exemption under section 47B of the FOI Act.

Disclosure of the material relating to the operations of third parties working in partnership with the Agency to deliver national digital health priorities would facilitate the objects of the FOI Act, by providing the applicant with access to information held by the Commonwealth Government (the Government) and increasing scrutiny of the Government's activities. However, I consider that release of this information could reasonably obstruct the future working arrangements between the Agency and third parties and adversely affect development of the My Health Record system and delivery of other national digital health priorities.

As for exemptions under subsections 47E(a) and (d), it is also of importance for exemptions under subsections 47G(1)(a) and (b) that a level of integrity and confidence is maintained for the continued free flow of ideas and that data and operational platforms are protected. It is important that employees of third party organisations and officers of the Agency can give full and uncensored consideration to opinions, advice and outcomes when engaging in operational functionalities. The ability and willingness of employees and officers to thoroughly consider all options would be adversely affected if the documents, or information within those documents, could then be disclosed to the public for debate and comment outside of official operational processes.

Therefore, it is reasonably foreseeable that allowing public access to some parts of these documents concerning the operations of third parties in working with the Agency would undermine the ongoing collaborative approach to implementing national digital health priorities.

In this case, I have formed the view that the disclosure of the information will make a negligible contribution to those factors in favour of disclosure. There is minimal public interest in this information being known. By contrast, the interference with the business affairs of the third parties is in my view significant.



In accordance with section 11B(4)(b) of the FOI Act, I have not taken any irrelevant factors into account when making my decision.

I have concluded that disclosure would, on balance, be contrary to the public interest. Accordingly, I find that the subsections 47G(1)(a) and/or (b) exemptions apply in relation to the identified material contained within the documents.

### ***Section 22 – Deletion of exempt or irrelevant material***

I have considered each of the documents identified in the schedule as being subject to an exemption to determine whether a portion or portions of each document could be released using the procedure envisaged in section 22 of the FOI Act. This includes redacting the identifying information for Agency staff involved in preparation of the briefs. I consider that they would reasonably expect that their names and phone numbers would not be disclosed as they are public servants, not public figures, and the information is not public knowledge. It would not make a valuable contribution to public debate to release the names of these individuals, nor would it shed light on the workings of Government. In addition, the information is in many cases also out of date with individuals not working in these areas any more, or in some cases no longer working for the Agency.

Section 22 provides that if an agency decides that granting access to a document would disclose information that is exempt or reasonably regarded as irrelevant to the request, then where it is reasonably practicable to provide a copy with deletions, such a copy should be provided.

I have decided to apply section 22 of the FOI Act to allow for the release of an edited copy of documents to which exemptions apply or which contain irrelevant material.

### **Your review rights**

If you are dissatisfied with my decision, you may apply for an internal review or an OAIC review of the decision. We encourage you to seek internal review as a first step as it may provide a more rapid resolution of your concerns.

### **Internal review**

Under section 54 of the FOI Act, you may apply in writing to the Agency for an internal review of my decision. The internal review application must be made within 30 days of the date of this letter, and be lodged in one of the following ways:

Email: [foi@digitalhealth.gov.au](mailto:foi@digitalhealth.gov.au)

Post: Freedom of Information  
Scarborough House  
Level 7, 1 Atlantic Street  
Woden ACT 2606 Australia

Where possible please attach reasons why you believe the review of the decision is necessary. The internal review will be carried out by another officer within 30 days.

### **Information Commission review**

Under section 54L of the FOI Act, you may apply to the OAIC to review my decision.

An application for review by the OAIC must be made in writing within 60 days of the date of this letter, and be lodged in one of the following ways:

Online: [OAIC FOI Review](#)

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Post: GPO Box 5218 Sydney NSW 2001

In person: Level 3, 175 Pitt Street Sydney NSW 2000

**Contact officer**

If you would like to ask any questions, the FOI team can be contacted by telephone on (02) 6223 0780 or email at [foi@digitalhealth.gov.au](mailto:foi@digitalhealth.gov.au).

Yours sincerely

A handwritten signature in blue ink, appearing to read 'B McMahon'.

Bettina McMahon

Authorised Decision-Maker

**Attachments**

Attachment A: Schedule of documents

Attachment B: Documents



Australian Government

Australian Digital Health Agency

**Attachment A: Schedule of the document – Freedom of Information Request no: FOI.1811002**

Document No	Date	Total no of Pages	Author	Addressee	Description of Document	Decision on access	Exemption/s
1	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Consumer participation in the MHR	Partial release	s.22
2	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Opt out numbers	Partial release	s.22, s.47C, s.47G
3	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Pre-MHR expansion program communications impact	Partial release	s.22, s.47C, s.47G
4	23 October 2018	6	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: MHR Expansion Provider Readiness	Partial release	s.22, s.47G
5	23 October 2018	6	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Communication activities	Partial release	s.22, s.47G
6	23 October 2018	5	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Aboriginal and Torres Strait Islander remote engagement	Partial release	s.22, s.47G

Australian Digital Health Agency ABN 84 425 496 912, Level 25, 175 Liverpool Street, Sydney, NSW 2000

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Document No	Date	Total no of Pages	Author	Addressee	Description of Document	Decision on access	Exemption/s
7	23 October 2018	5	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Hard to reach and vulnerable groups	Partial release	s.22, s.47E(d), s.47G
8	23 October 2018	5	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: International Comparison of approaches to digital health systems	Partial release	s.22, s.33
9	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Benefits realisation to date, including test beds	Partial release	s.22, s.47C, s.47G
10	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Children and young people (14 and 17 year olds)	Partial release	s.22, s.47G
11	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Children in care	Partial release	s.22, s.47B(a), s.47B(b)
12	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Family safety issues	Partial release	s.22, s.47B(a), s.47B(b), s.47E(a), s.47E(d), s.47G
13	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Genetics and genomics and the MHR	Partial release	s.22
14	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief:	Partial release	s.22

Document No	Date	Total no of Pages	Author	Addressee	Description of Document	Decision on access	Exemption/s
					Access to the MHR by employers and insurers		
15	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Clinician access to the MHR System	Partial release	s.22
16	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Contact centre services	Partial release	s.22, s.47E(d)
17	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Mobile apps	Partial release	s.22, s.47C, s.47E(d), s.47G
18	23 October 2018	4	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Notifiable Data breaches under the <i>My Health Records Act 2012</i>	Partial release	s.22, s.47E(a)
19	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Effective removal of a MHR	Partial release	s.22
20	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Payments to peak bodies from AusTender	Partial release	s.22, s.47E(d), s.47G
21	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: MHR reported event – management process	Partial release	s.22, s.47E(a)
22	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Consumer complaints	Partial release	s.22, s.47C, s.47E(d), s.47G

Document No	Date	Total no of Pages	Author	Addressee	Description of Document	Decision on access	Exemption/s
23	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: System performance	Partial release	s.22, s.47C, s.47E(a), s.47G
24	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: MHR program governance and assurance	Partial release	s.22, s.47E(d), s.47G
25	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Cyber security	Partial release	s.22, s.47E(a), s.47E(d)
26	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Auditing access to MHR	Partial release	s.22, s.47E(a)
27	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Privacy controls in the MHR	Partial release	s.22
28	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Privacy policy, protections and safeguards in the MHR	Partial release	s.22
29	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: MHR connections	Partial release	s.22, s.47B(a), s.47B(b), s.47Cs.47E(d)
30	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Re-platforming	Partial release	s.22, s.47C, s.47E(d), s.47G

Document No	Date	Total no of Pages	Author	Addressee	Description of Document	Decision on access	Exemption/s
31	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Australian Medical Association guidance on MHR	Partial release	s.22, s.47G
32	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Organisational structure	Partial release	s.22, s.47E(d), s.47E(c)
33	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Agency information and communications technology	Partial release	s.22, s.47E(a), s.47E(d)
34	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Finance – COAG Funding	Partial release	s.22, s.47E(d), s.47C
35	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Finance – Agency Funding	Partial release	s.22, s.47E(d), s.47C
36	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Finance – Expenditure Summary	Partial release	s.22, s.47E(d), s.47C
37	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Finance – MHR Expansion Program	Partial release	s.22, s.47E(d), s.47C
38	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Finance – MHR Operating Expenditure	Partial release	s.22, s.47E(d), s.47C

Document No	Date	Total no of Pages	Author	Addressee	Description of Document	Decision on access	Exemption/s
39	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: MHR opt out extension and hard delete	Partial release	s.22, s.47E(d), s.47C
40	23 October 2018	4	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Key facts and figures	Partial release	s.22, s.47E(d), s.47C
41	23 October 2018	1	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Secondary uses of data - implementation	Partial release	s.22
42	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: MHR opt out period process	Partial release	s.22, s.47E(d), s.47G
43	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Pharmacy registration	Partial release	s.22, s.47E(d), s.47G, s.47C
44	23 October 2018	4	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: MHR Expansion Program – individual healthcare identifier reconciliation	Partial release	s.22, s.47E(d), s.47G
45	23 October 2018	8	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: 2018-19 Budget implications	Partial release	s.22
46	23 October 2018	4	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Agency Achievements from January to June 2018	Partial release	s.22, s.47B(a), s.47B(b), s.47C, s.47E(d), s.47G



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47	23 October 2018	4	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: National Authentication Service for Health and Provider Digital Access	Partial release	s.22, s.47E(d), s.47G
48	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: National Digital Health Strategy	Partial release	s.22
49	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Australian National Audit Office 2017-18 closing report	Partial release	s.22, s.47E(a), s.47E(d), s.47G
50	23 October 2018	2	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: 2017-18 Financial Statements	Partial release	s.22
51	23 October 2018	5	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Global Digital Health Partnership Summit	Partial release	s.22, s.33, s.47E(d), s.47C
52	23 October 2018	3	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Communications activity budgets	Partial release	s.22, s.47E(d), s.47G
53	23 October 2018	4	Australian Digital Health Agency	Not applicable	Supplementary Budget Estimates 2018-19 brief: Clinical reference leads program	Partial release	s.22, s.47C, s.47E(d)