

Appendix 8: Use case – Queensland Government Department of Health

Use case information

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| Use case name | Data sharing between Queensland Health and the Brisbane North Primary Health Network |
| Date | 03/2024 |
| Data Requester | Brisbane North Primary Health Network (BN PHN) (and other Queensland Primary Health Networks). |
| Data Custodian | Queensland Health (QH) |
| Data Characteristics | The Deed of Disclosure between QH and the BN PHN states that QH may disclose data considered confidential (including patient-level) data from a range of data collections if approved by the relevant custodians, including the Queensland Hospital Admitted Patient Data Collection (QHAPDC) and the Emergency Department Collection (EDC). Given the breadth of data held by QH, there is not a prescribed/exclusive list of data and characteristics listed in the Deed as the relevant data to be shared is negotiated on a project-by-project basis. |
| Approved purpose | The data may only be disclosed by QH to BN PHN for the sole purpose of evaluating, managing, monitoring or planning primary and population-based health services. |
| Approved timeframe | On-going |
| Legal basis for sharing | <p>By establishing the BN PHN as a ‘prescribed entity’ under Queensland legislation, select QH confidential data may be disclosed to the BN PHN under the following Statutory Provision/s:</p> <ul style="list-style-type: none"> • Section 150(b) of the Hospital and Health Boards Act 2011 • Section 225(b) of the Public Health Act 2005 • Section 147(4)(h)(ii) of the Private Health Facilities Act 1999 <p>for the sole purpose of evaluating, managing, monitoring or planning of primary and population-based health services.</p> |
| Additional Notes | <p>Queensland Health has an ongoing partnership with the Primary Health Networks to develop and deliver sustainable primary health care and preventative health care programs for Queenslanders.</p> <p>Data sharing underpins development, implementation, monitoring and evaluation of these programs which may be department-led programmes (e.g. Health Needs Assessments, Local Area Needs Assessments) to Hospital and Health Services (HHS) aimed at local communities.</p> |

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| | Having the BN PHN listed as a ‘prescribed entity’ under the relevant statutory provisions allows for QH to enter into local data sharing agreements specific to individual programmes, without the administrative burden of having to obtain legal approval to disclose confidential data on each occasion (as this legal approval has been pre-obtained for specific purposes as identified above). |
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Alignment with attributes

The below table displays the alignment of the use case with the trusted entity attributes.

- **Strong alignment:** The data custodian required the data requester to provide significant evidence of the attribute to assess trustworthiness.
- **Partial alignment:** The data custodian required the data requester to provide some evidence of the attribute to assess trustworthiness.
- **Not assessed:** The data custodian did not assess the attribute, or it was not applicable.

| Theme | Attribute | Strong alignment | Partial alignment | Not assessed | Reasoning for alignment with attributes |
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| Transparency | Verifiable audit and assurance processes Where appropriate, internal and external processes will be implemented to verify compliance with legal and ethical standards, including those related to data environments and systems. | ✓ | | | The Deed of Disclosure between QH and BN PHN outlines the BN PHNs obligations regarding security and appropriate usage of data, including processes for security audits and protection of data. |
| Transparency | Public transparency standards The agency will have public-facing processes and/or standards for data release and publication. | | | ✓ | Whilst not a requirement in the Deed, BN PHN does have a public facing privacy statement . |
| Transparency | Transparent and defined project methodology | | | ✓ | The Deed between QH and BN PHN outlines the responsibilities regarding confidentiality, privacy, security, |

| Theme | Attribute | Strong alignment | Partial alignment | Not assessed | Reasoning for alignment with attributes |
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| | Clear and transparent project methodologies, including integration approaches, output vetting and risk management procedures, will be documented and shared with the relevant data custodian. | | | | unauthorised use and information privacy. Specific projects may outline additional requirements. |
| Accountability | Legally supported sharing Data sharing arrangements will be legally authorised and supported by clear documentation such as agreements and data sharing registers. | ✓ | | | This project is supported under Section 150(b) of the Hospital and Health Boards Act 2011; Section 225(b) of the Public Health Act 2005 and Section 147(4)(h)(ii) of the Private Health Facilities Act 1999. |
| Accountability | Ethical consideration Projects will undergo ethics consideration and where required approval, consent and review processes to ensure alignment with ethical standards. | | | ✓ | Data can only be used for evaluating, managing, monitoring or planning of primary and population-based health services. Data shared is often administrative in nature, with low-risk ethical considerations. |
| Accountability | Defined roles and responsibilities Agencies will have clear data roles and responsibilities to ensure accountability. | ✓ | | | The Deed outlines high level responsibilities of the BN PHN in receiving, handling, storing and using the data. Specific projects may outline additional requirements. PHNs adhere to national data governance frameworks, and the Primary Health Insights platform has common permission requirements for access, roles and responsibilities to consistently protect data. |

| Theme | Attribute | Strong alignment | Partial alignment | Not assessed | Reasoning for alignment with attributes |
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| Accountability | Authorised and skilled personnel Personnel will have the knowledge, skills, authorisation and training to use data appropriately, including training in data breach and risk management. | | | ✓ | The agreement between QH and BN PHN does not identify individual personnel nor specific role types, however the BN PHN complies with Australian privacy legislation (including the Australian Privacy Principles) and with the terms and conditions of data sharing agreements. BN PHN also participates in the National Governance Framework (developed by the PHN Cooperatives National Data Governance Committee) which includes procedures for data breaches and risk identification. |
| Data Management and Governance | Data quality processes Data quality management plans will be implemented to ensure data integrity and compliance. | | | ✓ | This would be the responsibility of the local QH area sharing data and BN PHN on a project-by-project basis. |
| Data Management and Governance | Data governance authorisations Agencies will have established data governance processes which have clear decision-making authorisations. This includes an understanding of the agencies data governance priorities, dispute resolution processes and accountable data custodianship roles. | | ✓ | | The Deed of Disclosure between QH and BN PHN outlines high-level responsibilities for security, privacy, dispute resolution and information privacy. Further responsibilities can be established as required. BN PHN also participates in the National Governance Framework (developed by the PHN Cooperatives National Data Governance Committee). |
| Data Management and Governance | Defined metadata management practices with accountable data custodianship roles | | | ✓ | QH retains authority over the metadata as the custodian of the data. |

| Theme | Attribute | Strong alignment | Partial alignment | Not assessed | Reasoning for alignment with attributes |
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| | Agencies will have defined metadata management practices which are accurate, consistent and accessible across the agency. This includes data lineage information. | | | | |
| Data Management and Governance | Consistent and controlled data release protocols Agencies will have clear operating models for data release, including for review, verification, and approval for release. | ✓ | | | The Deed between QH and BN PHN outlines high-level responsibilities for security, privacy, destruction of data, data reproduction and information privacy. The Deed also outlines restrictions on secondary data provision. Further responsibilities can be established as required. |
| Data Management and Governance | Established escalation and risk management frameworks Agencies will have established escalation pathways for managing risks and incidents. Projects will have comprehensive risk management plans which consider privacy by design and security risk assessments. | ✓ | | | The Deed of Disclosure identifies BN PHNs responsibilities regarding insurance, indemnity, dispute resolution, security and notification of disclosure. Further responsibilities can be established as required. BN PHN also participates in the National Governance Framework (developed by the PHN Cooperatives National Data Governance Committee) which includes procedures for data breaches (among others) and risk identification. |
| Security | Secure transfer mechanisms Agencies have secure mechanisms for data transfer to prevent breaches. | ✓ | | | The Deed between QH and BN PHN outlines responsibilities regarding encryption of data transfer, data security, information privacy, insurance and indemnity. |

| Theme | Attribute | Strong alignment | Partial alignment | Not assessed | Reasoning for alignment with attributes |
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| Security | Secure access control mechanisms Agencies will implement data safeguards, use secure access environments appropriate to the sensitivity of the data, and restrict data access to authorised users with appropriate security clearances. | ✓ | | | The Deed outlines the requirements of BN PHN to protect the security of data disclosed by QH. BN PHN stores and accesses data via their 'Primary Health Insights' (PHI) platform, which has a public security statement . The PHI platform utilises robust role-based access controls and multi factor authentication for all users. |
| Security | Certified secure environment Data will be accessed within certified secure environments appropriate to the classification of the data, e.g. ONDC Accredited Data Service Provider, IRAP-certified or Essential 8. | ✓ | | | BN PHN utilises PHI platform to safely store and analyse data. PHI is a Microsoft Azure platform which is accredited to ISO 27001 compliance and has met the requirements of the Australian Government for secure storage of both 'sensitive' and 'protected' information through the Infosec Registered Assessors Program (IRAP). |
| Security | Consistent security labelling and classification Agencies will assign appropriate security classifications for data assets and outputs to guide handling and sharing. | | | ✓ | The PHI platform is accredited to ISO 27001 and has met requirements to store 'protected' and 'sensitive' information as per the IRAP program. The National Governance Framework for all PHNs which supports data asset handling and governance. |
| Security | Established security clearance assessments | | | ✓ | |

| Theme | Attribute | Strong alignment | Partial alignment | Not assessed | Reasoning for alignment with attributes |
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| | Agencies will consistently use established security clearance/vetting process, e.g. Australian Government Security Vetting Agency. | | | | |
| Security | Incident monitoring and response mechanisms Mechanisms for incident monitoring, identification, and response are in place. | ✓ | | | The Deed outlines BN PHNs responsibilities regarding system monitoring, data security audits and disclosure breaches. Further requirements may be identified in local data sharing agreements. |
| Privacy | Data minimisation protocols Agencies will implement the privacy by design principle, including minimising the collection and storage of personal data to what is necessary to achieve the project, and adhering to approved retention and disposal practices. | | | ✓ | BN PHN only receive data for a particular purpose, as agreed by both QH and the PHN. |
| Privacy | De-identification mechanisms Agencies will have controls and safeguards to manage re-identification risks, including removing direct identifiers, limiting access to sensitive data, using secure transfer mechanisms or controlled | | ✓ | | The Deed states that the BN PHN cannot share, release and provide access to any data that could identify a person or health facility. Specific requirements can be outlined in data sharing agreements as appropriate. The BN PHN must ensure its processes related to safe handling of data adhere to the Office of the Australian Information Commissioner (OAIC) guidelines. |

| Theme | Attribute | Strong alignment | Partial alignment | Not assessed | Reasoning for alignment with attributes |
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| | environments, and adhering to the separation principle. | | | | |
| Privacy | Privacy incident reporting Agencies will have established processes to report privacy incidents and data breaches and fulfil legislative responsibilities. | ✓ | | | The Deed between QH and BN PHN states the legislative responsibility regarding confidential information, and requirements relating to security and disclosure breaches. The BN PHN also is obligated to report data breaches to the OAIC. |