



The Royal New Zealand  
College of General Practitioners  
Te Whare Tohu Rata o Aotearoa

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Tēnā koe Emma

## **The Office of the Privacy Commissioner – Health and privacy information**

The Royal New Zealand College of General Practitioners (the College) is the largest medical college in Aotearoa New Zealand with 6,018 members. Our General Practice Education Programme (GPEP) and Rural Hospital Medicine Training Programme (RHMTTP) trains the specialist General Practitioner and Rural Hospital Doctor workforce. The Medical Council of New Zealand accredits the College to deliver a Vocationally Registered workforce through its Continuing Professional Development Programme, making up 40 percent of the specialist medical workforce. The College is committed to prioritising the reduction of health inequities experienced by Māori, honouring Te Tiriti o Waitangi, and the rights of Māori. To do this we prioritise initiatives that support our members to develop cultural safety capability through all our Training, Member Professional Development and Quality programmes.<sup>1</sup>

Our members provide medical care to patients and their whānau. Each year approximately 24 million<sup>1</sup> patient contacts are recorded in 1,077 general practice teams across Aotearoa. They deliver first point of contact care to effectively manage 90 percent of all patient healthcare concerns in the community.

### **Our submission**

The College's Quality Programme, the College Medical Director and Medical Protection Society have reviewed the draft Privacy Code and provided feedback on the points below:

#### **Rule 5 of the Health Information Privacy Code**

##### ***Storage and security – operational security***

It is likely that most team members in general practice would not know the meaning of foot-printing. We suggest providing a definition.

##### ***Retention***

- It would be helpful for general practice teams to have the title in full if they need to follow up the reference: Health (retention of health information) Regulations 1996.
- The current wording, '*unless transferred to another doctor or to the patient*', is confusing and needs clarification as it can be read another way. It implies that the agency cannot dispose of records in this scenario.

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<sup>1</sup> Ministry of Health Data (2024)

## **Disposal**

- Provide clarity on shredding to reduce the likelihood of identified information.

## **Future consideration:**

- The College recommends that consideration is given to Artificial Intelligence (AI) technology. It is a rapidly developing area and its use within healthcare is changing the way clinicians interact with, diagnose and store patient data. Future advancement will require high-level principles to navigate AI use in general practice.
- Preliminary findings from the RNZCGP 2024 Workforce Survey and the AI in Primary care survey both indicate the prevailing attitude of GPs towards AI is optimistic but that caution in its implementation is required as it is already being used extensively in general practice and primary care for a range of tasks.<sup>v vi</sup>

Thank you for the opportunity to comment on Health Information Privacy Code Fact Sheet 5 on the Storage, security, retention, and disposal of health information, and the Draft update Health on the Road.

If you require further clarification, please contact Maureen Gillon, Manager Policy, Advocacy, Insights – [Maureen.Gillon@rnzcgp.org.nz](mailto:Maureen.Gillon@rnzcgp.org.nz).

Nāku noa, nā



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