

PCS CLINICAL AUDIT DATA AND AGGREGATION OF PRACTICE DATA POLICY STATEMENT – PEN COMPUTER SYSTEMS PTY LTD

The PCS Clinical Audit Tool™ (CAT) has been designed as an application to deliver a population health and chronic disease management perspective to patient data that resides in GP clinical desktop systems. All of the components associated with the operation of the system are installed locally on the GP practice system.

The only exception to this is licensing information which ensures that practice users are authorised to use the program. Each time the user logs into the PCS Clinical Audit Tool™ the system checks to see if there are any more recent versions of the program and whether the logged in user has a license to use the system. This is much like the automatic checking that Microsoft does to update the Windows environment on a desktop computer.

CAT™ provides facilities to create files in .PDF, .XML, and .XLS formats that a practice can use for internal purposes or for any purpose that the practice sees fit. The right to export data to any external databases, de-identified or otherwise, remains within the choice and management of authorised practice staff.

- 1. An example of an internal use would be the creation of an Excel file to support a mailout for overdue health checks. This information is identified patient information.*
- 2. An example of an external use would be the export of an XML file to data repositories such as that required of participants in the Australian Primary Care Collaboratives initiative administered by the Improvement Foundation. In this example the data does not include any patient identifiers and is the subject of rigorous “anonymisation”. (An example of anonymisation is if there are too few cases of a disease state the system would report 0 cases rather than 5 or less). Additionally to being de-identified, external use of data also requires that the practice consents to provide the data as is the case with the APCC program.*

In its collaboration with the Royal Australian College of General Practice (RACGP) some further patient consent attributes have been added to CAT™ to allow patients who do not wish to have their data included in any statistical de-identified data export to exercise that choice.

No patient data passes from a general practice to an external data repository owned by Pen Computer Systems Pty Ltd or on hosted servers that PCS uses. PCS earns its income from the licensing of CAT™ and software development. It has no interest in GP practice data which it believes is in the ownership domain of GPs and their patients.

There are many agencies that collect GP data for commercial or research purposes by arrangement with GP practices. We have referred to the APCC above, but there are many more.

Other examples include:-

- 1. Collection and aggregation of National Performance Indicators by Divisions of General Practice*
- 2. Collection and aggregation of data for research by Health Communication Network Pty Ltd through their General Practice Research Network™ initiative*

3. *Collection and aggregation of research data required by governments and other agencies which has passed through an ethics approval process such as that offered by the RACGP.*
4. *Collection and aggregation of practice data by Pharmaceutical companies.*

In all cases it is the GP that has to make judgements about the secondary use of practice data for these types of initiatives.

Irrespective of the validity of a data aggregation activity PCS will not be involved in handling or storing data that is associated with these initiatives. Without question PCS believes that it will be GPs that will determine which agencies will be eligible as custodians of GP-consented practice data.

PCS is a health informatics company that enjoys the privilege of delivering systems that assist Australia in the prevention and management of chronic disease through engagement with primary health services. We believe it is not in the public interest or in the company interest to have an investment in commercial use of patient data. In all cases, PCS products and development are consistent with this policy.

John Johnston BSc DipSci AIMM
Managing Director
Pen Computer Systems Pty Ltd

Phone: 02 9635 8955
Fax: 02 9635 8966
eMail: John.Johnston@pencs.com.au