



OFFICIAL

## Response to the Productivity Commission's Five Pillars of Productivity Inquiries interim reports

15/09/2025

Thank you for the opportunity to provide feedback on the Five Pillars of Productivity Inquiries interim reports.

The Australian Digital Health Agency (Agency) recognises the importance of uplifting productivity and welcomes the Productivity Commission's findings to date. Potential productivity gains in the healthcare system using digital health and emerging technologies have been flagged through your previous work developing the research paper 'Leveraging digital technology in healthcare'. Recommendations from the interim reports continue this trend, demonstrating the importance of data and emerging technologies to empower Australians, realise collaborative opportunities across organisations and better inform provision of health and care services.

The Agency's program of work, set out in the National Digital Health Strategy 2023–2028 and associated National Healthcare Interoperability Plan 2023–2028, recognises the potential of data to support a healthier future for all Australians through connected healthcare. Our submission will outline how the Agency is harnessing this potential to benefit Australians, healthcare providers and organisations, particularly in response to recommendations in the following interim reports:

- Harnessing Data and Digital Technology
- Delivering Quality Care More Efficiently

### [Harnessing Data and Digital Technology interim report](#)

#### **Response to draft recommendation 2.1: Establish lower-cost and more flexible regulatory pathways to expand basic data access for individuals and businesses**

The Agency welcomes the opportunity to provide comment on this draft recommendation and has been guided by the questions outlined in the information request, including:

##### *Information request 2.1:*

- *What types of data should be covered by the pathways?*

##### *Information request 2.2:*

- *What role should the Australian Government play in the development and coordination of the pathways, and supporting its success?*

Consumer health information and health data could be considered essential inclusions in the design of new national data pathways to enable connected, person-centred care and unlock the full value of Australia's health data. Australia's healthcare system contains a significant amount of health data across numerous locations nationwide, however much of this information is not readily

available to Australians and healthcare providers. Health information and administrative data is often collected at a point in time and remains siloed in different clinical systems. This limits near real-time access, continuity and connected care. As Australians move between providers, locations and care settings they are required to re-tell their story, undergo duplicate tests and navigate less-coordinated care.

Prioritising the sharing of health data using national digital health solutions and new data pathways turns health data into a valuable tool across a person's healthcare journey. Continuing the existing course correction of health data sharing initiatives, recognised in the 'Harnessing Data and Digital Technology' interim report, enables the availability of health information when and where it is needed. However, positioning health data to empower consumers and inform clinical decision making in near real-time requires both policy levers and national infrastructure to support the success of new data pathways. Work is already underway to modernise Australia's national digital health infrastructure and set the foundations for a connected interoperable ecosystem, which will see productivity rise through:

- improved consumer access, equity and continuity of care through digitally-enabled services
- empowered and engaged consumers, including through use of My Health Record and my health app
- better sharing of critical information for more clinically safe and effective decision-making at the point of care
- informed multidisciplinary care teams, providing more coordinated, comprehensive and personalised treatment
- reduced duplicate testing, saving consumers and healthcare providers time and money, and
- reduced administrative burden for healthcare providers, reducing time spent locating and retrieving relevant data.

Benefits will also be realised by harnessing de-identified data for research, delivery planning and public health purposes, ensuring the circumstances of identified populations are catered for. These include:

- guiding clinical decision making through analysis of individual health data within the context of similar groups of individuals
- informing service planning, healthcare delivery and public policy
- supporting population-level epidemiological research, healthcare and product innovation

The *Health Legislation Amendment (Modernising My Health Record—Sharing by Default) Act 2025* is a Government-led policy change requiring information sharing by healthcare providers into My Health Record, starting with pathology and diagnostic imaging. This has already seen significant growth in the number of pathology and diagnostic imaging providers connecting into the My Health Record System as the sector prepares for mandatory uploading and a notable shift too in consumer behaviour. Between June 2024 and June 2025, the number of uploads within this sector increased by 35% for pathology reports and 41% for diagnostic imaging reports. This early response suggests that the policy intent alone is influencing behaviour in the sector. Importantly, this increased availability of information is driving increasing consumer engagement. Views of pathology and diagnostic imaging reports rose by 64% and 62% respectively over the same period.

Increasing interaction is continuing, with consumer and healthcare provider engagement with pathology and diagnostic imaging trending upward since share by default was announced by Minister Butler in 2023, shown in Figures 1–4 below.

Figure 1: Consumer views of pathology reports within My Health Record from May 2022 to July 2025

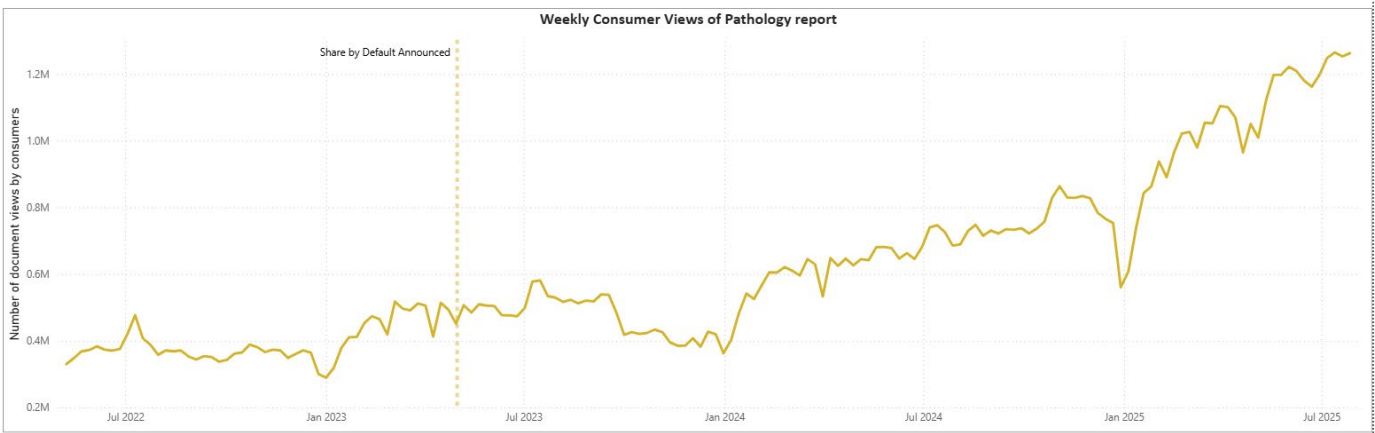


Figure 2: Consumer views of diagnostic imaging reports within My Health Record from May 2022 to July 2025

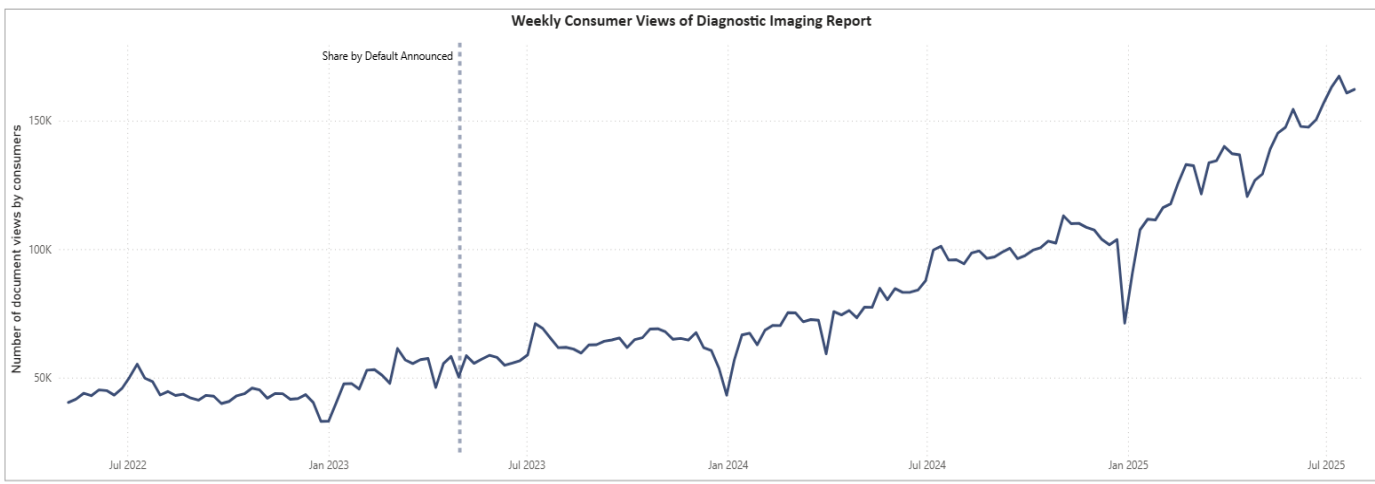
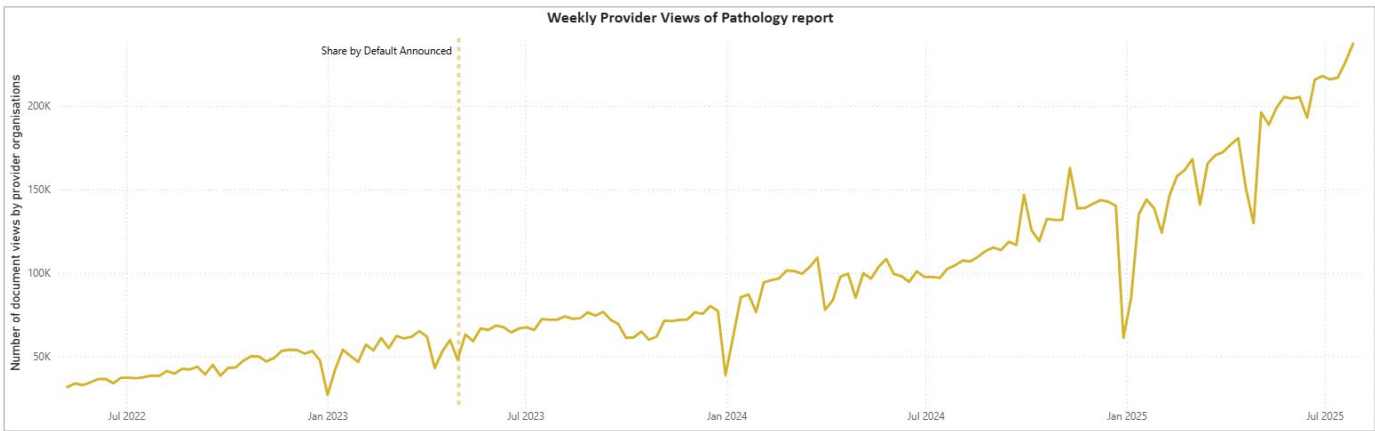
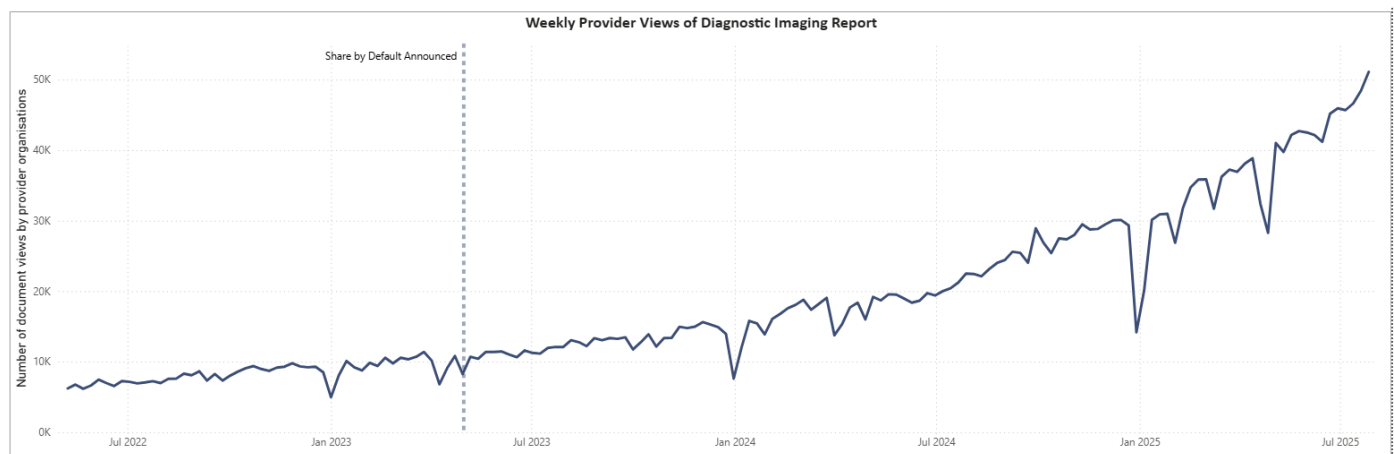


Figure 3: Healthcare provider views of pathology reports in My Health Record from May 2022 to July 2025



*Figure 4: Healthcare provider views of diagnostic imaging reports within My Health Record from May 2022 to July 2025*



To bring share by default into full effect, legislative rules are currently being developed to provide the details of which health services must register to participate in My Health Record and what health information must be uploaded.

Over time, share by default will be expanded beyond pathology and diagnostic imaging reports to include other key health information to further empower Australians and increase the availability of health data for users of the My Health Record System. While share by default introduces new registration and upload requirements, an extension process will be established by the Agency to provide organisations with time to ensure their clinical systems are conformant with the My Health Record System. This balances the need for increased health data availability and the time that may be needed by some providers for system change to ensure the security of health data when uploading into the system.

The share by default approach is being implemented alongside the delivery of initiatives under the National Healthcare Interoperability Plan 2023–2028. Expansion of the use of healthcare identifiers, coupled with adoption and use of digital health standards, will support a more connected ecosystem to share data.

The Australian Common Framework for Interoperability (AU CFI) initiative under the Plan addresses the need to maximise the use of common interoperability patterns, standards profiles, platforms, infrastructure, and processes, when delivering digital health solutions. The AU CFI supports the continued collaboration with the Department of Health, Disability and Ageing, HL7 Australia and CSIRO on the [Sparked Accelerator Program](#), which is accelerating industry uptake of the HL7 Fast Healthcare Interoperability Resources (FHIR) standard. The AU CFI and Sparked products will be leveraged to underpin Application Programming Interface (API) information exchanges using standards including FHIR, creating new pathways using standardised data transfers across clinical information systems and repositories.

As the steward for the My Health Record System, the Agency is building a FHIR repository to ensure health data captured in the system is ready to adapt to emerging technologies, such as artificial intelligence, and importantly connect into Health Connect Australia, Australia's upcoming national health information exchange.

The establishment of [Health Connect Australia](#) will enable near real-time transfer of health data between systems, providing Australians the ability to more easily share their data with and between healthcare providers, and ensuring patients are receiving the most effective and informed care when needed. The new data pathways of Health Connect Australia will reduce the need for duplication of clinical information across both a provider's clinical system and My Health Record by connecting systems directly through API exchanges to share information.

However, adoption and use of digital health solutions is reliant on how well sectors are engaged and change is communicated. Preparing the healthcare system requires ongoing awareness activities and review of the system's readiness to change, exemplified in Health Connect Australia roadshow presentations and in-person stalls at numerous healthcare industry events. In addition, the Agency is developing Digital Health Communities – an online platform to enhance engagement and enable meaningful consultation with external stakeholders – both in healthcare and technology – regarding interoperability. The platform supports knowledge sharing, experience exchange and peer-to-peer networking across the digital health sector. A pilot for this platform is underway and a broader release planned in 2026 will include the wider Standards community.

### **Response to draft recommendation 3.1: An alternative compliance pathway for privacy**

As new data pathways are enabled, the increased availability of health data, including associated administrative data and identifying data, reinforces the importance of safeguarding personal information and sensitive health information for Australians as they navigate their healthcare journey. As a Commonwealth entity, the Agency complies with the requirements of the *Privacy Act 1988* (Cth). In addition, data held within the My Health Record System is subject to stringent collection, use and disclosure parameters embedded in the *My Health Records Act 2012* (Cth) and associated rules and regulations, designed in line with the purposes of the *Privacy Act 1988* (Cth).

Any alternative compliance pathway will need to be reviewed for alignment with the Agency's legislative obligations as System Operator of My Health Record. However, as noted in [our initial submission to the 5 Pillars of Productivity Inquiries](#), any opportunity to harmonise data breach reporting obligations across the two pieces of legislation is welcomed for clarity, certainty and security.

### **Delivering Quality Care More Efficiently interim report**

### **Response to draft recommendation 2.1: Governments should embed collaborative commissioning, with an initial focus on reducing fragmentation in health care to foster innovation, improve care outcomes and generate savings**

The Agency welcomes the opportunity to provide comment on this draft recommendation and has been guided by the questions outlined in the information request, including:

#### *Information request 2.1*

- *What additional factors to establish a consistent joint governance framework should be considered?*
- *How should LHNs and PHNs partner with ACCHOs and other organisations?*

The lack of available health data and limited information sharing between healthcare organisations contributes to fragmentation in healthcare. National digital health solutions work across organisations to improve the quality and safety of healthcare provision and ensure more streamlined continuity of care as consumers transition from one service to another.

To do this, the Agency works in collaboration with the Commonwealth, state and territory governments through the Intergovernmental Agreement on National Digital Health to deliver more personalised and connected health and wellbeing experiences for all Australians. This collaboration reduces duplication of digital health solutions and infrastructure across states and territories and ensures efficient use of resources to support health information exchange across Australia.

As part of this collaboration, the Agency engages with Local Hospital Networks (LHNs), Primary Health Networks (PHNs) and Aboriginal Community Controlled Health Organisations (ACCHOs), recognising the important role each of these organisations play in a person's healthcare journey. The use of national digital health solutions and infrastructure could be considered when establishing a joint governance framework to facilitate information sharing that moves with people across these services and reduces the need for continually re-telling their story. Currently, development of the national provider directory capability as part of Health Connect Australia involves collaboration with NT Health, QLD Health, North Coast PHN and St Vincent's Private Health to co-design and pilot functionality and ensure it is fit-for-purpose for use across all organisations. Future tranches of the share by default legislation will likely see increased availability of primary care health data in My Health Record which will support Australians as they move between LHNs, PHNs and ACCHOs.

Looking to the future, as national digital health solutions expand access into the allied health sector, these solutions will begin to bridge the gap between healthcare and care provision, improving outcomes in both for consumers and providers.

By ensuring the availability of health data for healthcare organisations at all levels, national digital health solutions and new data pathways go beyond boundaries to strengthen successful collaborative provision of healthcare.