



Hospitals

My Health Record expansion program

Managing My Health Record incidents

My Health Record clinical incidents, including complaints and feedback

A **clinical incident** is defined by the Australian Commission on Safety and Quality in Health Care (ACSQHC) as *'an event or circumstance that resulted, or could have resulted, in unintended and/or unnecessary harm to a person and/or a complaint, loss or damage.'*

A clinical incident can be related to safety, usability, technical, privacy and/or security issues.

The incident may relate to the My Health Record system directly, or the behaviour of clinical software when interacting with My Health Record.

Complaints/feedback

Health services will handle My Health Record-related consumer feedback in accordance with local consumer feedback policy and procedures. This may involve reporting the feedback through local risk management procedures.

Where it is determined that consumer feedback is not related to your health service, the consumer should be advised to lodge the feedback directly with the System Operator (refer to key contacts). The Department of Health and Human Resources (the department) has developed resources to assist health services in handling feedback related to the My Health Record. These resources can be found on the department's My Health Record Expansion Program [website](#).

In some circumstances, a complaint or piece of feedback may constitute a notifiable data breach. Health services must report all notifiable data breaches to the My Health Record System Operator, as per existing privacy and clinical data breach policies. For further information on mandatory data breach notification visit the Office of the Australian Information Commissioners [website](#).

Incorrect information in a patient's record

Incorrect information can appear in a number of ways in a person's My Health Record. Errors may be present in notes entered by healthcare providers or data could be mismatched, resulting in information being uploaded to the wrong patient record. While instances of this are rare, incorrect information in a My Health Record is considered a clinical incident and immediate action should be taken to resolve the issue.

Where incorrect information has been identified in a patient's My Health Record standard local health service policies/procedures should be implemented for reporting clinical incidents. The data breach should be escalated to the System Operator of My Health Record in accordance with the My Health Record Act.

Incorrect information in a document you have uploaded

If you become aware that information in a clinical document you have authored contains an error or is incorrect, you should upload a new, correct version of the document. Depending on the software that you use to interact with My Health Record, you may also be able to remove a document 'in error'.

The System Operator should also be notified to ensure no other clinicians have viewed the incorrect information to reduce the occurrence of a clinical incident.

Incorrect information entered by another clinician

If you suspect that information entered by another clinician, such as a general practitioner, is incorrect you may be able to verify this with them as part of your contact regarding the patient's treatment. Ideally, the clinician should amend or remove any incorrect information.



Where this is not possible or if the issue cannot be resolved, contact the My Health Record help line on 1800 723 471 to report a clinical safety issue to the System Operator.

Error in data automatically uploaded by Medicare

When an error exists in information that has been automatically uploaded into a patient's My Health Record, such as Medicare Benefits Schedule (MBS) or Pharmaceutical Benefits Scheme (PBS) data, contact the My Health Record help line on 1800 723 471 to report a clinical safety issue to the System Operator.

The affected patients should also be directed to contact the System Operator.

Unexplained technical errors

If you identify an unexplained error in a clinical document that you have uploaded to a patient's My Health Record, or have encountered a technical problem or service disruption while using My Health Record:

- ◆ Contact your IT support team to establish if it is a local issue
- ◆ Contact the department's Health Technology Solutions team to determine if the issue can be resolved at the message level (refer to contacts for further information).
- ◆ If Health Technology Solutions manages your software, an INFRA ticket should be logged.

Notifying the System Operator

The My Health Record Act 2012 stipulates that a healthcare provider must notify the System Operator in situations where

1. there has been, or may have been, an unauthorised collection, use or disclosure of the health information included in a healthcare recipient's My Health Record, or
2. the security or integrity of My Health Record has been, or may have been, compromised by employees

These situations are referred to as notifiable data breaches. If you are unsure if you need to notify the System Operator, contact the Digital Health branch for further details.

The System Operator should be advised of notifiable data breaches as soon as possible, preferably within two (2) days of the clinician becoming aware of the incident. This will allow the System Operator to take any steps to:

- ◆ protect the system, and minimise any other risks
- ◆ notify any additional bodies as required by law (such as the Australian Commission on Safety and Quality in Health Care or the Australian Information Commissioner)
- ◆ notify any affected patients (or potentially affected patients).

Even if the incident has been resolved, clinicians and staff members are still required to make an appropriate notification to the System Operator.

Once a notification is received, the System Operator may begin an investigation to understand the causes of the incident, evaluate any risks, and take any steps to prevent further incidents. In the course of the investigation the System Operator may contact your health service for further information.

Key contacts

Digital Health Standards and Advisory

Department of Health and Human Services
myhealthrecordexpansion@dhhs.vic.gov.au

Health Technology Solution

Phone: 1300 551 690 or 9473 3800

System Operator

Phone: 1800 723 471
My Health Record
Box 9942 Sydney NSW 2000

For Further Information

Select this link: [My Health Record <https://www.myhealthrecord.gov.au/>](https://www.myhealthrecord.gov.au/) to visit the National My Health Record website

Alternatively, visit the Department of Health and Human Services [website <https://www2.health.vic.gov.au/hospitals-and-health-services/quality-safety-service/my-health-record/resources>](https://www2.health.vic.gov.au/hospitals-and-health-services/quality-safety-service/my-health-record/resources) for additional resources

To receive this publication in an accessible format phone **9096 0749** using the **National Relay Service 13 36 77** if required, or email myhealthrecordexpansion@dhhs.vic.gov.au