



**Health
Information
and Quality
Authority**

An tÚdarás Um Fhaisnéis
agus Cáilíocht Sláinte

Frequently Asked Questions

**Draft information governance
and management standards for
the health identifiers operator
in Ireland.**

March 2015

We want to hear your views on the management of health identifiers

Background to the public consultation

What is this public consultation about?

The Health Identifiers Act 2014 means that any person, who has used, is using or may use a health and social care service in Ireland will be given an individual health identifier (often shortened to IHI), a number which safely identifies them. The Health Identifiers Act 2014 does not change the current way health service providers share your medical records. Your health information is considered to be personal data under the Data Protection Acts and the rules of data protection still apply.

The Health Identifiers Act 2014 also means that any health services provider who provides health and social care services in Ireland will be given a health services provider identifier (often shortened to HSPI), which uniquely identifies them (see Appendix 1 for more details). The HSPI will be given to both healthcare organisations and healthcare professionals.

The Health Identifier Act 2014 allows the Minister to delegate specific functions under the act to the Health Service Executive. A business unit within the Health Service Executive (HSE) will be set up to manage your health identifier record, which consists of your IHI and other personal data. This business unit will be known as the **'health identifiers operator'**.

How is HIQA involved?

The Health Information and Quality Authority (the Authority) has developed draft information governance and management standards to support the introduction of health identifiers into the Irish health and social care system. Implementing these standards will promote trust among service users and health service providers that the national registers have been established in accordance with the law and in line with international best practice. In turn, this creates confidence that health service providers can be uniquely identified and can uniquely identify the service users to whom they are providing services, which ultimately leads to improvements in patient safety.

What's in the public consultation document?

The public consultation document lists the information governance and management standards that should apply when IHIs are introduced. You will be assigned an IHI when you use a health or social care service in Ireland. Therefore, it is important that you:

- know that health identifiers are being implemented
- understand why having an individual health identifier is important
- understand that the operator of the registers is obliged to put information governance and management practices in place, which will protect the privacy, confidentiality and quality of your health identifier record.

How can I get involved and is there any deadline to meet?

You can view HIQA's proposed standards on our website, www.hiqa.ie. Your feedback will be considered carefully and will inform the final version of these standards. The deadline for you to submit your feedback or comments is 24 April 2015 at 5 pm.

How will you use my comments?

Following the consultation, we will analyse the public submissions and as a result may make further amendments to the document in order to finalise the standards.

How to make a submission

A number of consultation questions have been prepared in a consultation feedback form for your consideration when reviewing the standards. They are not intended, in any way, to limit feedback, and any other comments are welcome. There are three ways to tell us what you think:

- Complete the online consultation feedback form by clicking [here](#). This will bring you to an online version of the consultation feedback form.
- Download the consultation feedback form from www.hiqa.ie and email your completed forms to standards@hiqa.ie.

- Print off a copy of the feedback form from our website and post it to us at:
Health Information and Quality Authority
Draft Information Governance and Management Standards for the
Health Identifiers Operator in Ireland
George's Court, George's Lane
Smithfield, Dublin 7

For further information or if you have any questions you can talk to the consultation team by calling (01) 828 6748. You can also find us on Facebook and Twitter.

Frequently asked questions about health identifiers

What is an individual health identifier or IHI?

An individual health identifier or IHI is a number that uniquely and safely identifies each person that has used, is using or may use a health or social care service in Ireland. It is not the same as an electronic health record, which is an electronic version of a patient's medical history.

Why do I need an individual health identifier?

An individual health identifier will uniquely identify every individual accessing health and social care services. The main benefit of having an individual health identifier is to ensure patient safety. Being able to uniquely identify each user will improve patient safety by reducing the number of adverse events that may happen, such as giving the patient incorrect medication or vaccinations or admitting the wrong person for surgery. Your IHI is different from an electronic health record, which is an electronic version of your medical history. The IHI is one of the key enablers required to implement electronic health records and eHealth solutions such as ePrescribing. The IHI has the following benefits:

Benefits for service users:

- Improved accuracy in identifying you and your medical records will lead to safer and better care being provided to you
- your records in different healthcare organisations may be accurately associated with you
- your health information can be shared safely and seamlessly between public and private health service providers, for example referral letters sent from a public hospital to a private sector GP
- health identifiers enable electronic transfer of your health information, which results in faster care for you

Benefits for general practices:

- Accurately links service users to their record
- identifies patients in all communications with other health and social care providers
- enables safe transfer of patient records electronically
- enables electronic referrals, discharge summaries and electronic prescriptions to be sent, which results in more timely exchange of important information.

Benefits for healthcare providers:

- helps create and maintain a complete record for each patient
- enables patient information to be shared safely within and across organisational boundaries
- improves efficiency in administrative tasks.

Benefits for social care providers :

- Accurately and safely identifies people who use social care services
- helps create a complete record of a person's care by its inclusion on records that may span different health and social care organisations
- safe and efficient coordination of social care with healthcare.

How will my IHI be used?

Your IHI can be stored on your health services provider's computer system or on paper if no electronic system exists. It will be used in your medical record at the health service provider that you attend. Here are some examples:

- After you attend your general practitioner (GP), your IHI will be stored on their local system in your medical record, whether paper or electronic. Any time your GP communicates with another health service provider on your behalf, your IHI will be included on that communication. Should you require a blood test, for example, your GP will include your IHI with this request. The hospital will return both your IHI and the result of the blood test to your GP. This allows your GP to safely identify you when they receive the result.
- Your IHI will be recorded on your medical record in the hospital's computer system if you attend an emergency department. When the hospital sends a discharge letter to your GP, your IHI will be included in that communication to your GP. The discharge letter may be paper or electronic. This allows your GP to safely identify you when they receive the discharge letter.

What data is stored in my health identifier record?

A health identifier record is a combination of your individual health identifier and other personal data that is used to safely identify you. The Health Identifier Act 2014 allows for the following data to be collected and stored in your health identifier record:

Data in your health identifier record:

- Surname
- Forename
- Date of birth
- Place of birth
- Sex
- All former surnames
- Mother's surname and all her former surnames
- Address
- Nationality
- Personal public service number (if any)
- Date of death in case of a deceased individual
- Signature
- Photograph

However, initially only a subset of what is legally allowed to be stored in your health identifier record will be stored.

Is my IHI the same as my personal public service number (PPSN)?

No. Your IHI is not the same as your Personal Public Service Number. Your individual health identifier will be a unique number that is different to your PPSN.

Could my PPSN not be used instead?

No, your PPSN could not be used instead. In 2009, the Authority published *Recommendations for a Unique Health Identifier for Individuals in Ireland*. Based on international best practice, one of the recommendations made to the Minister is that the current PPSN is not used as the identifier in health and social care. The Authority recommended that the safest and most cost-effective option for an IHI for Ireland is a new healthcare-focused identifier. Evidence from other countries tells us that for many reasons, including privacy and patient safety, it is better to have a specific number to identify you when you are accessing health related services.

Also, your PPSN was created and primarily used to access various services across the Irish public sector. Your IHI will be used across the public and private health sectors. For example, your IHI will be included in written communications between your public hospital and your GP, who works in the private sector.

Why is the PPSN number stored as part of my health identifier record?

The Authority conducted an international review of how other countries set up their IHIs and the majority of countries reviewed take data from existing trusted sources in order to get the best use of existing public infrastructure. An example of a trusted source for the National Register of Individual Health Identifiers is the database of the Public Service Identity (PSI) dataset (which includes the PPS Number) maintained by the Department of Social Protection. One reason why the PPSN is included in your health identifier record is to allow the central IHI computer system to be created and subsequently updated from existing trusted sources (see Appendix 3 for more detail on trusted sources). This is also in order to get the best use of existing public infrastructure.

Can someone use my individual health identifier to look up my PPSN?

No, it will not be possible for anyone to look up your PPSN number using your individual health identifier. However, you may provide your PPSN to your health service provider to allow them to retrieve your IHI from the National Register of Individual Health Identifiers. Your PPSN will never be provided to your health service provider when they look at your IHI record and therefore will not be included in your health care records.

Is medical information stored on my health identifier record?

No, medical or clinical information will never be stored on your health identifier record. However, it is intended that health services providers will use your IHI when communicating with other health service providers about your care.

Who will be issued with an individual health identifier?

Any person, who has used, is using or may use a health and social care service in Ireland will be given an individual health identifier. Individual health identifiers can be used in both the public and private sector.

Can I opt-out of having an individual health identifier?

Individual health identifiers are being implemented to improve patient safety, so it is to your advantage if the IHI is used when you access health or social care services in Ireland. Under the Health Identifiers Act 2014, you will be automatically assigned

an IHI. Since introducing a system of individual health identifiers drives improvements in patient safety, it is to your advantage to use your IHI when you access health or social care services in Ireland.

Do I need to know my individual health identifier to receive care?

No. Your individual health identifier is not related to your eligibility for care. You do not need to know your individual health identifier to receive health or social care in Ireland.

What sort of access will service providers have? How can I be sure that they will use my information responsibly?

Health service providers will have access to a national register of individual health identifiers to:

- obtain your IHI
- send requests to update your health identifier record.

To request your IHI from the National Register of Individual Health Identifiers, your health services provider will need to know other personal details - for example your name, address, and date of birth.

Health identifier records need to be kept safe and secure under legislation – both the Data Protection Acts and the Health Identifier Act 2014 apply. Penalties apply if it is discovered that your IHI is not adequately protected or used incorrectly.

Is this new system supported by legislation?

Yes. A new law called the Health Identifiers Act 2014 was passed in 2014 and allows two new national data collections – called the National Register of Individual Health Identifiers and the National Register of the Health Services Provider Identifiers – to be set up. Essentially these will be two central computer systems.

Who will look after my health identifier record?

The Health Identifier Act 2014 allows the Minister to delegate specific functions under the act to the Health Service Executive. A business unit within the Health Service Executive (HSE) will be set up to manage your health identifier record, which consists of your IHI and other personal data. This business unit will be known as the **'health identifiers operator'**.

Are there safeguards in place to stop the sharing of an IHI or using the number inappropriately?

Your IHI is considered to be personal data under the meaning of the Data Protection Acts. This means that the health identifiers operator must follow the eight rules of data protection, as follows:

- obtain and process information fairly
- keep it only for one or more specified, explicit and lawful purposes
- use and disclose it only in ways compatible with these purposes
- keep it safe and secure
- keep it accurate, complete and up to date
- ensure that it is adequate, relevant and not excessive
- retain it for no longer than is necessary for the purpose or purposes
- give a copy of his and or her personal data to an individual, on request.

In addition under the Health Identifiers Act 2014, penalties will apply if your IHI is used incorrectly.

How will the central IHI register be set up?

The plan is to initially populate the National Register of Individual Health Identifiers from existing reliable data sources – known as trusted sources. It is likely that the database of the Public Service Identity (PSI) dataset maintained by the Department of Social Protection may be used to do this since its data has been verified as accurate. More information on what roles different organisations are responsible for can be found Appendix 2 while more information on trusted sources can be found in Appendix 3.

Can health insurance companies access the National Register of Individual Health Identifiers?

No. Health insurance companies do not have access to the National Register of Individual Health Identifiers or your full health identifier record.

Can health insurance companies use my IHI?

Yes. Your IHI will be included in correspondence from your health service providers to health insurance companies. This is to ensure that you are safely identified. This helps to verify that any claims submitted relate to care that you have received.

Who will govern what other agencies have access to the IHI?

The Minister for Health is ultimately responsible for ensuring that only those who are allowed access to the IHI can access it.

I am worried about identity theft as many of my personal details will be included in my health identifier record. Are there safeguards in place to prevent this happening?

Your health identifier record is considered personal data within the meaning of the Data Protection Acts, and must be treated appropriately by the health identifiers operator. Under the Health Identifiers Act 2014, penalties will apply if your IHI is used incorrectly.

Who will access my individual health identifier?

Primarily, your IHI will be accessed by your health service providers, both public and private, when they provide a health or social care service to you. Under the Health Identifier Act 2014, other agencies can have access to the National Register of Individual Health Identifiers, as follows:

List of agencies who can have access to the National Register of Individual Health Identifiers:

- Chief Inspector of Social Services
- Child and Family Agency
- Health Research Board
- Irish Blood Transfusion Service
- Irish Medicines Board
- Mental Health Commission
- National Cancer Registry Board
- State Claims Agency

Some organisations may use your IHI for a particular secondary purpose, such as health promotion, health service management or research. Secondary use involves using your number without having direct access to the register. It may be that they

are provided with your number in correspondence with your health service provider. These organisations are listed in the Health Identifiers Act 2014, as follows:

List of agencies who can use your IHI for a secondary purpose:

- Bord na Radharcmhastóirí
- Central Statistics Office
- A coroner
- Dental Council
- Health Information and Quality Authority
- Health Insurance Authority
- Inspector of Mental Health Services
- Irish Medical Council
- National Treatment Purchase Fund Board
- Nursing and Midwifery Board of Ireland
- Pharmaceutical Society of Ireland
- Pre-hospital Emergency Care Council
- A registration board established by or under the Health and Social Care Professionals Act 2005
- An undertaking authorised to operate a scheme of health or health-related insurance under the Health Insurance Act 1994.

Will using my individual health identifier change the way my health information is shared?

No. Having an individual health identifier on your medical records will not change how and when health service providers share information about you. Your health information is considered to be personal data under the meaning of the Data Protection Acts. This means that the eight rules of data protection must be adhered to.

Appendix 1 Health service provider identifiers

What is a health services provider identifier?

A health services provider identifier is a unique number that is assigned to a health services provider, such as a hospital, clinic or a registered healthcare professional. It can be shortened to HSPI.

Who will be given a health services provider identifier?

A HSPI will be given to registered healthcare providers and people within health or social care providers who are required to access the National Register of Individual Health Identifiers.

What are the benefits of having a health services provider identifier (HSPI)?

The HSPI is another one of the key enablers required to implement electronic health records and eHealth solutions such as ePrescribing. The benefits from implementing electronic health records include:

Benefits for service users

- supports the secure exchange of health information by uniquely identifying both healthcare professionals and organisations when information is being exchanged
- assists administrators of health information systems to manage who can access these systems
- acts as a building block or enabler to support the introduction of national electronic health systems, such as ePrescribing
- supports audit trails in national electronic health systems. For example, in England, it is possible for patients to book and alter appointments themselves in outpatient clinics. This service would not be possible without health service providers having unique identifiers.

Benefits for healthcare practitioners

- facilitates secure transmission of patient information, such as laboratory results or discharge letters
- reduces administrative effort.

Benefits for healthcare organisations:

- supports the introduction of a statutory licensing system that applies to both publicly and privately funded healthcare service
- provides a single authoritative source of healthcare practitioners and organisations, which will remove the need for multiple computer systems to maintain their own copy of this data, which in turn will save time, resources and administrative effort.

Benefits for professional regulatory bodies:

- Improves tracking of healthcare practitioners across regulatory authorities and internationally.

Benefits for service planners:

- reduces administrative effort, by having a single authoritative source rather than multiple systems containing similar data
- supports the ability to measure and analyse how resources, including the workforce are used to provide health and social care services
- enhances the ability of health agencies to plan services.

How will the HSPI be used?

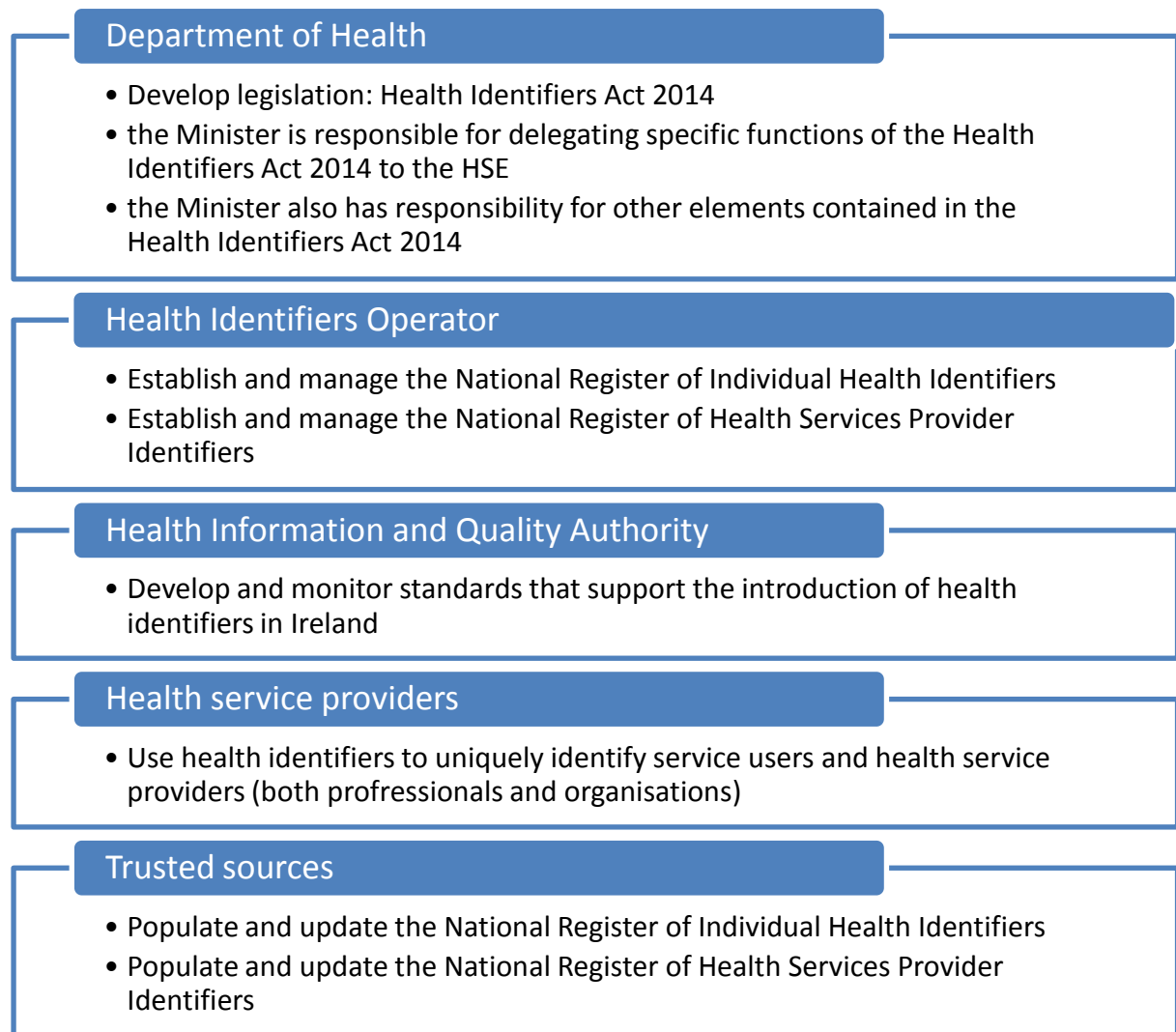
When your health services provider shares information with another health services provider about you, the health services provider HSPI must be included on each communication. For example, when a laboratory returns your blood test result to your GP, the HSPI of the laboratory will be included in the laboratory report. This increases accountability and transparency since the health service provider will be uniquely identified in the communication.

Appendix 2 Organisations involved in introducing health identifiers to Ireland

Many organisations within the health and social care sector need to work together to successfully introduce health identifiers. These are:

- Department of Health
- Health identifiers operator
- Health Information and Quality Authority
- Health service providers
- Trusted sources (see Appendix 3 for more detail on trusted sources)

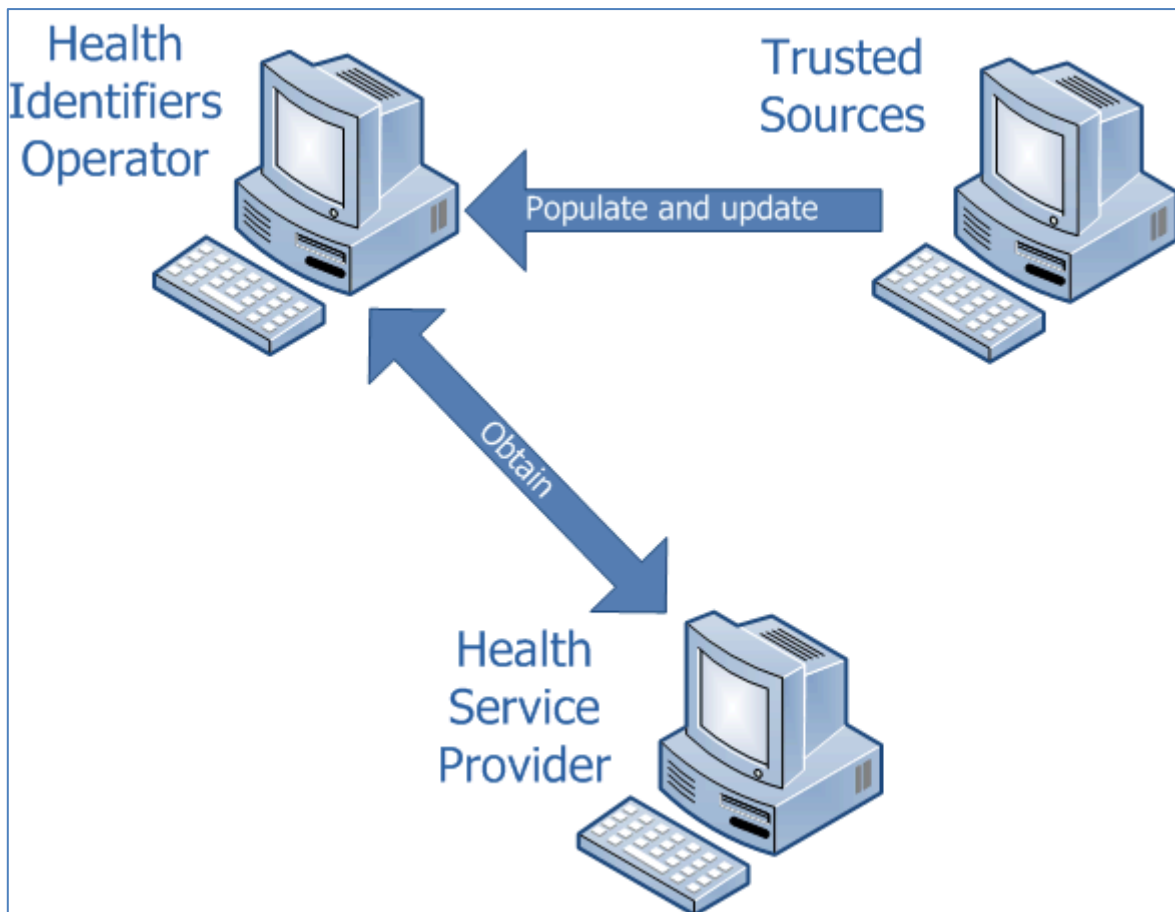
The following illustrates what the role of each of these organisations is, as health identifiers are introduced in Ireland.



Appendix 3 What is a trusted source?

A trusted source is a data source that is considered highly reliable and is used to populate or update the national registers. An example of a trusted source for the National Register of Individual Health Identifiers is the database of the Public Service Identity (PSI) dataset maintained by the Department of Social Protection. An example of a trusted source for the National Register of Health Services Provider Identifiers is the Register of Medical Practitioners, which is maintained by the Irish Medical Council. A health service provider is either a health or social care professional or organisation. Health service providers will use the national registers as part of their day-to-day work to either obtain health identifiers or request updates to them. Figure 1 illustrates this relationship.

Figure 1: How trusted sources are used to populate or update the national registers



Your IHI information can be lawfully shared with health service providers under provisions in the Health Identifiers Act 2014. Your IHI information can also be obtained from trusted sources under provisions within the Health Identifiers Act 2014.

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