Question 1: Are all the benefits of the IHI (Individual Health Identifier) clear to you?
Yes

Are there any other benefits of the IHI that we should include?
1. A more in-depth description of the benefits on current work practices in healthcare providers, would be useful. We recommend the use of fictitious examples in this regard.
2. An explanation would be useful on the benefits of including each of the IHI data set items, in particular the photograph and signature.

Question 2: Have we identified all the privacy risks for the IHI?
No

Are there any other privacy risks for the IHI that we should include?
1. Risks exist due to the different levels of privacy protection within currently deployed systems (e.g. PCRS). A mitigation of this risk would be a staggered implementation timeline.
2. If the IHI is to be printed on health receipts, these can be casually discarded by people.
3. The HIQA standards say that health insurers will not have access to your IHI, but what happens where a health insurer is a healthcare provider, i.e. VHI Swiftcare Clinic?

Question 3: Have we identified sufficient safeguards for protecting your information in the IHI?
Not sure

Are there any other safeguards for IHI that we should include?
1. The importance of Privacy Impact Assessments that include a public consultation every time the IHI PIA is updated should be stated clearly, as well as the optimum time in the Information Asset Life Cycle to conduct them.
2. A more in-depth description of the governance/oversight arrangements for the National Register (i.e. more than what exists on page 33 and Section 5.3) would act as a safeguard against the public losing trust on how the business service operates.
3. Several references are made to HIQA std. 4.1: The Health Identifiers Operator delivers regular “evidence-based” training for its staff....etc. However, the importance of objective standards for measuring the effectiveness and appropriateness of such training (e.g. Information Governance, Data Protection) should be explicitly stated.
4. The challenges of interoperability in healthcare are a barrier to improved healthcare but are not mentioned in this document. It therefore would be beneficial to have a ‘plain English guide’ on how the IHI (and associated records) can be shared between healthcare providers (e.g. http://rippleosi.org/information-governance-demystified)