

4 May 2022

## Privacy Commissioner

By email: [privacy.code@privacy.org.nz](mailto:privacy.code@privacy.org.nz)

Tēnā koe

### Health information Privacy Code 2020 Amendment No 1

Tōpūtanga Tapuhi Kaitiaki o Aotearoa, New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on Health information Privacy Code 2020 Amendment No 1.

NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing 55,000 nurses, midwives, students, kaimahi hauora and health workers on professional and employment matters. NZNO embraces te Tiriti o Waitangi and contributes to the improvements of the health status and outcomes for all Aotearoa New Zealanders through influencing health, employment, and social policy development. Furthermore, we share the intent of the Ministry of Health's definition of equity which equally applies to NZNO work across professional, industrial and member activities.

NZNO's response to the questions is as follows:

1. Do you support the change to the title of the definition of 'disability support services'? *NZNO agrees with the proposed change in title*
2. Do you agree that the definition of 'health information' encompasses information about end-of-life services and that no further change is needed? *NZNO agrees with the definition of health information and no further action is required*
3. Do you support the proposed changes Rule 13:
  - Whether the list of agencies specified at Rule 13 is appropriate, having regard to the structural changes that are to take effect on 1 July 2022; *NZNO supports the proposed change*
  - Whether the proposal to extend the funding provision to include any health agency that is funded whether wholly or partly and whether indirectly or directly by a state service to provide health or disability support services is appropriate? *NZNO supports the proposed change*
  - Does it go too far in permitting assignment of the NHI? If so, what change (if any) would you recommend we consider? *NZNO supports the proposed change*

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4. Are there any other changes occurring in the structural reform of the health and disability support sector that need to be reflected in changes to the Code? *NZNO recommends that as the changes continue to occur with the health sector reforms that additional work or further changes be undertaken in a timely manner.*

We thank you for the opportunity to provide feedback on your consultation.

Nāku noa nā



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