

2020-08/004

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Codes Reissue Submissions
Office of the Privacy Commissioner
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Tēnā koe

Submission on the Revocation and Replacement of the Health Information Privacy Code under the Privacy Act 2020

Tōpūtanga Tapuhi Kaitiaki o Aotearoa, New Zealand Nurses Organisation (NZNO) welcomes the opportunity to comment on the above proposal.

NZNO has consulted its members and staff in the preparation of this submission, in particular members of: Colleges, Sections, as well as professional nursing and policy advisers. NZNO is the leading professional nursing association and union for nurses in Aotearoa New Zealand, representing around 51,000 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 of all people of Aotearoa New Zealand through influencing health, employment and social policy development.

The NZ College of Critical Care Nurses (NZCCCN) supports the proposed changes and believes that this change reflects nursing practice guidelines regarding patient privacy such as NZ Nursing Council Standards of Practice and Code of Conduct.

Overall NZNO agrees with the proposed changes however we have concerns with the wording of the new information privacy principle section 2(2)(e)(v) and Health Information Privacy Code rule 2(2)(c)(iii). From health literacy perspective, the section requires attention to ensure clarity and consistency of purpose that better fits the health context.

We do not wish to make an oral submission.

Nāku noa nā

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