

Subject:

Feedback Exposure Draft for Data Availability and Transparency Code 2022

Thank you for the opportunity to provide feedback on the *Exposure Draft of the Data Availability and Transparency Code 2022*.

Key feedback for consideration from the WA Department of Health includes:

- The exposure draft is supported.
- It is noted that the draft code expands upon the data sharing principles specified in the *Data Availability and Transparency (DAT) Act 2022* by providing helpful guidance to stakeholders (Commonwealth data custodians, accredited users and accredited data service providers) on the appropriate safeguards required under each principle.
- The data sharing principles are strongly supported.
- It is noted that the data sharing principles are based on the Five Safes Framework, which aligns to the governance and policy reforms that have been implemented in the WA Department of Health to improve the maturity of information management governance within the WA health system.
- It is noted that the data sharing principles also align to the principles outlined in the *Privacy and Responsible Sharing Discussion Paper*. The discussion paper was released as part of a process to consider the introduction of legislation in WA that would be equivalent to the Commonwealth's *DAT Act 2022* and *Privacy Act 1988*.

Kind Regards,

Anthony

Anthony Jones | Manager Policy and Governance | Information and Performance Governance Unit
Information and System Performance Directorate | Purchasing and System Performance
Department of Health
Level 1, A Block, 189 Royal Street, EAST PERTH WA 6004
Whadjuk Country

