



## **Advisory to NZHIT members**

### **Digital, Data and Technology Services – minimum requirements notice from MOH**

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August 2019

The New Zealand Ministry of Health (MOH) has recently released a notice outlining baseline requirements that are expected of health organisations in this country (see copy attached). It is not an exhaustive list of requirements and sets out what should be considered as minimum levels of practice. Nonetheless, it is an important notice as it establishes minimum expectations on common requirements to be met by all digital services to ensure they are safe, secure, integrated, reliable and provide appropriate access to data and information.

NZHIT has had the opportunity to provide input to this notice prior to it being finalised and supports the leadership that this notice provides to the sector. It aligns with NZHIT's vision that there will be world class health and wellbeing for all New Zealanders fully enabled by digital technology; along with our purpose to provide an open environment enabling a coordinated, informed voice that maximises health, social and economic value for New Zealand through digital technology.

#### **General**

Whilst these minimum requirements are not solely about standards, they are a key enabler for achieving this vision and purpose. Standards are a means to establish consistency, set levels of expectations and provide the ability for various digital systems to interoperate, exchange data and support clinical decision-making.

The majority of NZHIT's health IT member organisations will already be achieving, or in the process of achieving, the minimum set of [Health Information Standards Organisation](#) (HISO) standards, roadmaps and architecture guidelines as published by the (MOH). In this case, the notice to health organisations should not prove onerous as the minimum requirements should already be in place, or not difficult to attain. The notice could provide an opportunity to engage with health agencies on identifying where gaps may exist and how members can assist where applicable.

HISO plays a very important role in supporting and promoting the development and adoption of fit-for-purpose health information standards for New Zealand's health and disability sector. NZHIT supports HISO and is pleased to be partnering with them to provide the leadership that both organisations bring to the sector, especially as standards will have an increasing influence on the development of digital technologies based on strong and stable foundations.

To this end, NZHIT is very pleased that HISO has recently accepted the nomination of John Carter (CTO, HealthLink Ltd) to join the HISO committee as the industry partner's representative. This builds on an already strong relationship and will enable NZHIT members to further engage and participate in this very important area.



Please be aware that, as New Zealand’s digital health sector moves towards an environment where some standards will become mandatory, there is an important distinction between the current use of the words “conformance” and “compliance”. The former describes the need to demonstrate that the outcomes of a certain standard are being met even if the standard itself may not be partially or fully followed (e.g. a different standard may be in use that achieves or exceeds the required outcomes). The latter prescribes the adherence to a certain standard and requires that a particular standard is adopted in order to achieve specified outcomes.

NZHIT supports the need to achieve national consistency in the application of standards and these must also have international applicability. Whilst individual health agencies may from time-to-time require variants to these standards it is important that this practice is not widespread, the reasons for doing so are transparent and does not place unreasonably onerous compliance and cost burdens on NZHIT’s members. Similarly, the support of (and investment in achieving) mutually agreed standards must also be recognised by way of purchasers of digital health solutions only contracting with those who demonstrate they have made the commitment to these standards.

#### **Data, Interoperability and Governance**

The MOH notice also contains minimum requirements in the areas of data governance, sharing, transfer and accessibility – all of which are important as we move to a more open environment that enables consumers of health services to be more aware of, and take greater control of, their own data and information.

Interoperability is a key factor in achieving this future state and NZHIT draws member’s attention to the [NZ Vision for Interoperability](#) that was released as a living document in December 2016. In particular, the interoperability vision (page 4) and charter (page 5) are particularly relevant as these set out a future state for New Zealand’s health and disability sector to achieve.

NZHIT also believes that all stakeholders across the sector must understand and accept the responsibilities that data governance, security and privacy places on all those who collect, store and share health related data and information. This requires a collaborative, shared approach that recognises ultimate responsibility sits with directors of health organisations when carrying out their duties as governors of their respective organisations.

#### **Commercial**

NZHIT expects that its members will apply sound commercial practices when contracting to provide or receive new digital health solutions. Contracts should take into account the full life cycle of a solution including maintaining and updating versions of the software. This is to ensure it continues to meet minimum requirements and supports advances in health service delivery.



For this reason, NZHIT also supports the situation where existing digital health solutions currently in use are upgraded to their latest version and kept up to date. This requires that members ensure there is a commercial agreement in place to this effect and they are not financially disadvantaged in this respect.

The changes occurring across health systems nationally and globally provides opportunities for NZHIT members to partner and work together to provide collaborative, integrated digital health solutions. This is especially relevant where health systems are breaking down their siloed approach to health service delivery. This also places an onus on members to review their business models in order to be in a position to take advantage of these opportunities by forming partnerships that strengthen the digital health offerings both in New Zealand and internationally.

Hence, NZHIT advises members to seek out partnership opportunities and to establish mutually beneficial commercial agreements that will enable the provision of enhanced solutions to the health and disability sector, now and into the future. At the same time any collaborative approach must support the achievement of a fully interoperable framework, enables an efficient and stable market environment, and does not create anti-competitive practices.

### **Communication**

Please do not hesitate to contact me if you have any questions in relation to this advisory. I am especially interested in receiving information that will be useful in advocating on behalf of members particularly where this enables NZHIT to continue providing leadership in order to achieve its vision and purpose as outlined above.

Yours sincerely

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