



## **Endorsement of Dr Peter R Croll for the Privacy Medal**

I write to nominate and endorse Dr Peter Croll as a worthy candidate for the Australian Privacy Medal. By taking a national lead his achievements have helped earn Australia international recognition in this increasingly important topic. Peter continues through significant voluntary effort to promote the need for a professional approach in the area of health privacy. He firmly believes that failure to adopt the correct attitude and behaviour towards privacy compliance will be detrimental to our advancement in health. This includes both our knowledge and understanding brought about by research and the quality of service we can provide in healthcare services. Peter has achieved this through the organisation of national health privacy events, speeches at key note presentations and extensive publication where he continues to influence a wide ranging audience. He has intentionally focussed on both understanding and reaching the health practitioners while simultaneously building a network of key stakeholders to promote further discussion and understanding.

As the president of the Health Informatics Society Australia, I am continually reminded off the critical importance of the need to sensitively handle privacy issues. Informatics relies on advanced technologies which offer huge potential for supporting tomorrow's health initiatives against a backdrop of our aging population. This generates an acute challenge as those most in need are not necessarily the section of our society that are the most willing to be 'early adopters' of new technologies. Furthermore, the current established, and often bureaucratic, structures in our healthcare services are often risk adverse and resistant to change. The technology itself is complex, easily misunderstood and although potentially highly beneficial it can easily suffer from inappropriate application. **Yet it is the multi-pronged approach that Peter has taken that sets him apart.** This nomination will identify how he contributes at demystifying the technology to the practitioner, seeking solutions to enable privacy enhancing research, address the privacy concerns with the aged, untangle the complexities of the current legislation and act as an advocate for reform to ensure mutually beneficial medical outcomes.

I know Peter is too modest to self nominate and would prefer to use his time to advance our understanding of health privacy. This is why I am motivated to ensure that a person with energy, devotion and commitment to a very worthy cause is given due recognition for his ongoing efforts. Much of the material presented here can be found on the web sites that Peter personally maintains to ensure he disseminates his message as widely as possible. I have requested copies of his resume and publications to support this nomination. When he was approached in regard to being nominated he told me his main interest would be the opportunity to hopefully attend the award dinner function to help make more influential contacts. This to me typifies his values whereby his primary interest is supporting the cause and not promoting self interest. It is therefore that I have absolutely no reservations in endorsing this nomination for an enthusiastic, likeable and dedicated professional.

A handwritten signature in black ink, appearing to read "Michael Legg", written in a cursive style.

Dr Michael Legg  
President, Health Informatics Society Australia.

### **Executive Summary**

Prior to detailing Dr Croll's achievements I would like to summarise his key contributions as follows:

#### **i) Organising national privacy events:**

- 1) initiated and will chair the inaugural national Health Privacy Futures conference, 2008;
- 2) initiated and chaired the national eHealth Privacy and Security Symposium (ehPASS), 2006;
- 3) promoted ehPASS to the international level at prestigious Medinfo2007;

4) chaired two national forums in Sydney on the proposed law reform changes effect on health;

**ii) Representation on Health Privacy at the national / international level:**

5) initiated and now chairs the Health Privacy Forum (HIPS) as a special interest group for HISA;

6) represents Health Privacy on the influential Coalition for eHealth, 2008;

7) invited as the sole Australian representative at the IMIA's WP4 forum in Dijon, France, 2006;.

8) invited to participate on the ALRC privacy reform technical sub committee;

9) made a personal submission on privacy issues to the Health and Social Security Access Card;

10) authored two ALRC privacy submissions on behalf of the HISA members;

11) initiated a national survey on behalf of HISA on the privacy law reform proposals;

**iii) Personal Health Privacy initiatives:**

12) funded to be a national fellow investigating privacy for CSIRO's Preventative Health flagship;

13) funding (e.g. ARC) to investigate new paradigms to address security failings for privacy;

14) established the Australian Health Privacy map to help demystify the legislative framework;

15) recognition of the need to address the real concerns over privacy by the aged in our society;

**iv) Disseminating Health Privacy:**

16) contributed through numerous international Key Note presentations on Health Privacy risks;

17) produced a special international journal issues on Health Privacy, 2008;

18) produced several publications to inform practitioners about the concerns over health privacy;

19) invited to make media press releases and contributions on pertinent privacy issues;

20) invited to present to HREC on health privacy guidelines and their interpretations;

21) international recognition through IMIA year book citation.

*Evidence to support for each of the above is provided in the specific contribution section below.*

**Background:**

Dr Croll's contribution to Health Informatics spans the past decade. As a software engineer with over 30 years' experience in life critical computer applications (known as safety critical computing) he has always been interested in promoting safe and dependable practices. The approach to such systems mandate that risks are as low as reasonably practicable. Following years of research it was Dr Croll's realisation that privacy in health applications could present unnecessary and avoidable risks that prompted him to investigate this further. His initial publications that focussed on project risks of health applications highlighted privacy. His resultant methodology, called QUIPS, was published widely and reported in international events and cited by IMIA (International Medical Informatics Association ) the leading Health Informatics international body (note that the 'P' in QUIPS stands for Privacy).

Peter advocated then and still does that Privacy was a more fundamental issue than information security. The (IMIA), now in its 40<sup>th</sup> year, was more aligned with the traditional concept of providing adequate security measures to provide the required confidentiality for sensitive health information. This is still evident in its support of its Working Party 4 (security) as the main committee to address privacy concerns. Peter was the only Australian asked to present at an invitation only IMIA workshop in Dijon, France. He continues to this day to promote the importance of getting privacy right with informatics and not relying as we do on computer legacy implementations that fall short when compared with our policy expectations.

## **Specific Contributions**

### **i) Organising national privacy events:**

1) *initiated and will chair the inaugural national Health Privacy Futures conference, 2008:*

This conference demonstrates Peter's ability to raise a network of support for his work. He formed a formidable organisation committee who are keen to support him based on his prior contributions to the field: This includes: Cathy Clutton, *Executive Director, Health Evidence, NHMRC*; Dr Bridget Bainbridge, *General Manager, E-Health Policy, NEHTA*; Malcolm Crompton, *M.D., Information Integrity Solutions*; Dr Christine O'Keefe, *Research & Business Leader, Health Data & Information, CSIRO*; John Galligan, *Director Corporate Affairs, Microsoft*; Prof Michael Frommer, *Associate Dean Health, Sydney Uni.*; Emeritus Prof Bill Caelli, *Director ISEc Pty Ltd.*; Dr George Margellis, *Intel Australia Digital Health Group*; Susan Smith, *Cardiac Surgical Register Coordinator, QLD Health*; Brendan Lovelock, *CEO, HISA Ltd*. Further information can be found at [www.healthprivacy.org.au](http://www.healthprivacy.org.au).

2) *initiated and chaired the national eHealth Privacy and Security Symposium (ehPASS), 2006:*

Peter was responsible for initiating and chairing the first national eHealth Privacy and Security Symposium (ehPASS). This event attracted 80 delegates from 5 States/Territories to present and debate pertinent issues of Health Privacy, see <http://conf.isi.qut.edu.au/ehpass2006>. An executive director from the NHMRC attended and gave a positive endorsement (see here "ehPASS regarded as a great success", [www.ehealth.qut.edu.au/events/#events](http://www.ehealth.qut.edu.au/events/#events)).

3) *promoted ehPASS to the international level at prestigious Medinfo2007:*

Peter raised the bar for ehPASS at the most prestigious international event for ehealth. This was achieved through success with a competitive proposal for a workshop at MedInfo 2007 which attracts 3000+ international delegates across the spectrum of interest in health informatics, (see [www.ehealth.qut.edu.au/events/Medinfo2007.jsp](http://www.ehealth.qut.edu.au/events/Medinfo2007.jsp)).

4) *chaired two national forums in Sydney on the proposed law reform changes effect on health:*

To encourage open debate from leading health practitioners, users, researchers and vendors, Peter organised, chaired and presented two national forums in Sydney. These were timed to gain feedback prior to the ALRC submissions and set the scene for HPF'08, see (1) above. Further details and evidence of the presentations are available at the HISA privacy library: [www.hisa.org.au/privacylib](http://www.hisa.org.au/privacylib).

### **ii) Representation on Health Privacy at the national / international level:**

5) *initiated and now chairs the Health Privacy Forum (HIPS) as a special interest group for HISA:*

As President of the Health Informatics Society Australia, I was encouraged when Peter proposed the formation of a special interest group on Privacy and Security, called HIPS. This provides more than just a forum as evident from its Objectives, i.e. Provide through the professional HISA body a centre of expertise focusing on Privacy and Security in Health Informatics that will: keep a watching brief on technology, policies and legislation with regard to its effect on the Australian business and services community as well as the general public; provide a service for HISA members relating to best working practice; develop a forum for discussing contemporary issues; act as an advocate on government policy to represent the interests of its members; provide a focal point for consortium member organisations and other interested formal entities; maintain a knowledge base of international developments and provide position papers to both inform and respond to initiatives, see: [www.hisa.org.au/hips](http://www.hisa.org.au/hips).

6) *represents Health Privacy on the influential Coalition for eHealth, 2008:*

The Coalition for eHealth ([www.ceh.net.au](http://www.ceh.net.au)) has representation from the leaders of over 40 societies, consumer groups, health colleges, etc., for example, AMA, APS, RCNA. Peter represents the interests of Health Privacy (HIPS) at these high powered meetings.

7) *invited as the sole Australian representative at the IMIA's WP4 forum in Dijon, France, 2006:*

Peter had a paper on 'health data integration privacy risks' accepted as one of only 12 international presenters (the only Australian) at the International Medical Informatics Association working conference WG4 "Security in Health Information Systems" in Dijon, France This was a 'papers by invitation only' event with a limited audience and each presenter is funded through the EU Framework

program. The aim is to inform Brussels of the agenda being set for future research work under the EU in this area, see attached conference flyer.

8) *invited to participate on the ALRC privacy reform technical sub committee:*

Peter was invited by the president of the Australian Law Reform Commission, Prof David Weisbrot, to join the technical committee for review of the privacy law reforms.

9) *made a personal submission on privacy issues to the Health and Social Security Access Card:*

Peter made a personal submission on the proposed Health and Social Security Access Card where he emphasised the necessity to be better informed over privacy concerns and consumer attitudes as this could be a critical showstopper, see [www.ehealth.qut.edu.au/about/healthcard.jsp](http://www.ehealth.qut.edu.au/about/healthcard.jsp).

10) *authored two ALRC privacy submissions on behalf of the HISA members:*

Peter used the many avenues that he had initiated to raise informed debate on health privacy issues identified above to provide material for two ALRC submissions. The two detailed submissions endorsed by Health Informatics Society Australia were both structured and authored by Peter. This represents his willingness to make significant contribution on a voluntary basis to a cause he truly believes in, see the ALRC documents at: [www.hisa.org.au/privacylib](http://www.hisa.org.au/privacylib).

11) *initiated a national survey on behalf of HISA on the privacy law reform proposals:*

To gather further informed opinion on health privacy law reform, Peter created and undertook a national online survey across both HISA members and by specific invitation to our related societies.

**iii) Personal Health Privacy initiatives:**

12) *funded to be a national fellow investigating privacy for CSIRO's Preventative Health flagship:*

Peter was funded as a CSIRO Fellow for the National Research Flagship for Preventative Health. The outcome was the development of Medical Data Access software to promote privacy compliance for data custodians/researchers. This fellowship resulted in 14 presentations plus 3 keynotes over 9mths on the Privacy and Security risks with Health data linkages at national/international events and an eHealth futures business case report to CSIRO's senior executive. See attached resume and media releases.

13) *funding (e.g. ARC) to investigate new paradigms to address security failings for privacy:*

Peter has recognised the shortcomings of contemporary computing systems at providing adequate measures for privacy. To demonstrate the alternative commercially available technologies he succeeded in obtaining competitive grants from the Australian Research Council. The demonstrator built was presented at the ehPASS events and continues to gain interest as we witness increasing failings even with the most secure banking sector. Peter recognises that the 'threat from the insider' is increasing gaining evidence and damaging the necessary trust with tomorrow's information systems, see [www.ehealth.qut.edu.au/projects/ARC\\_e-research.jsp](http://www.ehealth.qut.edu.au/projects/ARC_e-research.jsp)

14) *established the Australian Health Privacy map to help demystify the legislative framework:*

Evidence that Peter is not afraid at taking on challenging topics that can assist our understanding of the complex legislative environment that has evolved in Australia is his development of an Australian Health Privacy map. His aim is to provide a community site development (Wikipedia style with monitoring) to help demystify the current legislative framework across Private/Public and State/Federal domains, see [www.healthprivacy.com.au](http://www.healthprivacy.com.au).

15) *recognition of the need to address the real concerns over privacy by the aged in our society:*

Two important projects that Peter manages are focussed on addressing the need for assistive technologies in our increasingly aged society. Although, a small percent will embrace computer technology the majority of seniors will find it challenging and intrusive. To address their real privacy concerns Peter has presented to national conferences on aged care to include: 'Privacy and Security of the Smart Home', HISA Aged Care Informatics national conference, MEDINFO 2007 and Assistive Technologies for the Frail Elderly, Chronic Illness, Sufferers and People with Disabilities – a Case Study of the Development of a Smart Home, 18th Aus. Conf. on Information Systems 5-7 Dec 2007.

**iv) Disseminating Health Privacy:**

**16) contributed through numerous international Key Note presentations on Health Privacy risks:**

Peter's CV shows he has been widely recognised internationally for his work and understanding in health privacy. In particular, he has been funded in the past 18 months to visit Korea and Saudi Arabia to give keynote presentations on Health Privacy, see [www.ehealth.qut.edu.au/events/#news](http://www.ehealth.qut.edu.au/events/#news). In addition he was invited to give Keynotes at national conferences, e.g. Australian College of Health Service Executives (ACHSE, QLD) that has shown how the inappropriate handling of privacy concerns can be a real showstopper with IT projects, see [www.achse.org.au/ebulletin/Networker/jun08/080625-qld-state-conf.pdf](http://www.achse.org.au/ebulletin/Networker/jun08/080625-qld-state-conf.pdf)

**17) produced a special international journal issues on Health Privacy, 2008:**

To ensure his messages reaches as wide an audience as possible Peter has produced a special journal issue on health Privacy and Security for the international journal eJHI, see [www.ejhi.net](http://www.ejhi.net). This required using his contacts to obtain publication input for leading international players in this field.

**18) produced several publications to inform practitioners about the concerns over health privacy:**

Peter appreciates that focussing on just academic journals would not provide the outcomes he seeks in dissemination to a wide range of users and practitioners. His impressive publication list therefore includes, for example, articles for the Lexus Nexus Privacy Law Bulletin, see "Are undue Privacy concerns putting our Health research at risk", [http://www.blicl.com/index\\_files/Page492.htm](http://www.blicl.com/index_files/Page492.htm) & [www.csiro.au/news/newsletters/0606\\_phealth/story5.htm](http://www.csiro.au/news/newsletters/0606_phealth/story5.htm)

**19) invited to make media press releases and contributions on pertinent privacy issues:**

I know that Peter has been requested to make many media press releases on the subject of privacy. His articles appear in the national and local press. Some examples are attached and can be found at [www.ehealth.qut.edu.au](http://www.ehealth.qut.edu.au).

**20) invited to present to HREC on health privacy guidelines and their interpretations:**

Following Peter's presentations at national events he has been asked to explain his interpretations of the complexities of Health Privacy to Human Research Ethics Committees. For example, QUT's Human Research Ethics Committee, Training & Planning Day 20th June, 2007. This is further evidence of his desire to get the message across to the most appropriate people of improving health outcomes through responsible access to health data.

**21) international recognition through IMIA year book citation:**

Finally, it should be recognised that Peter's pragmatic approach to disseminating the outcomes of his works and research as been acknowledged at the highest level in his discipline. His work on QUiPS that has a significant focus on the Privacy risks was reported in the International Journal of Medical Informatics. This paper was selected as representing the best of the papers in Bio and Medical informatics in 2007 when cited in the 2007 Yearbook of the International Medical Informatics Association (IMIA). The yearbook represents "the most original, excellent state-of-the-art research in the area of health and biomedical informatics of the past year". This paper was the only paper from Australia to be selected under the best papers category where 35 papers were selected for inclusion as the best internationally with half of these top-tier papers originating from North America to including, for example, the prestigious Stanford and Harvard Universities. The following is the citation in the Yearbook summary that endorses this paper:

Croll PR, Croll J  
Information Security Institute, Queensland University of Technology (QUT), Australia  
Faculty of Health, Queensland University of Technology (QUT), Australia  
Investigating risk exposure in e-health systems, Int J Med Inform 2007;76(5-6):460-5

"The hindrances to the adoption of information technologies include traditionally cultural aspects and resistance to changes and innovation, but also the costs and threats for privacy. On the technical aspect, interoperability and maturity are also usual causes discussed. The original approach of Peter and Jasmine Croll, in their paper entitled "Investigating risk exposure in e-health systems", is therefore of particular interest, as they propose an integrated model aiming at providing a framework to help build trustworthy solutions. ....A valuable point of their work is the practical outcomes that have been validated on two large Australian projects."

See [www.ehealth.qut.edu.au](http://www.ehealth.qut.edu.au) and [http://www.blicl.com/index\\_files/Page492.htm](http://www.blicl.com/index_files/Page492.htm).