

Thursday, 18 November 2021

RE: Application to the ACCC for Authorisation AA1000577

I write to provide a letter of support to WAPHA for the ACCC authorisation of Primary Sense. By way of background I am a practicing GP, and currently Clinical Director, Specialist Medical Services, Gold Coast Health. Previously, I was the Clinical Lead for the Gold Coast PHN and the Primary Care lead for Clinical Excellence Queensland's Healthcare Improvement Unit, and had a national role in Scotland supporting general practices to adopt quality improvement programs and implementing quality improvement initiatives to improve patient care.

A number of Primary Health Networks (PHNs) are currently exploring the option of adopting and providing a new health population management and clinical audit tool to support general practices: Primary Sense. I have been involved in the development of Primary Sense as a member of the Clinical Reference Group since 2018.

I believe that Primary Sense is of significant public benefit as it supports general practices and GPs to more comprehensively and seamlessly incorporate quality improvement into their daily workflow and achieve improved health outcomes for their patient. Primary Sense offers several features and benefits to general practice and PHNs that are different to those provided by other existing vendor tools. Primary Sense incorporates the internationally validated ACG John Hopkins Risk Stratification tool, and clinician decision support tools for General practitioners. Designed as a tool for general practice to support quality and safe care, it also performs other functions including health reporting on demand, clinical audit functions and consent managed data extraction.

Developed by Gold Coast PHN (GCPHN), in collaboration with local GPs, academics and data experts, Universities and the Royal Australian College of General Practice, Primary Sense is a clinical tool developed by GPs for GPs. It is supported by the practical experience of 83 general practices teams, including 487 individual GPs servicing 630,000 Gold Coast residents – almost 90% of the region's population.

Primary Sense offers PHNs considerable cost savings as well as the opportunity to be hosted on Primary Health Insights, the collaborative data storage and analytics platform developed by PHNs nationally, capitalising on this infrastructure investment and the high levels of security, privacy and data governance incorporated into the platform. This delivers the highest level of data security to the data extracted from general practices.

As Primary Sense has been developed by clinicians with PHNs, it enables greater public health benefit. Aggregated, anonymous, real-time data provides great potential for population health management and joint regional planning. PHNs will also be able to directly monitor usage by general practice and direct product development and investment from an enhancement perspective. The experience of Gold Coast general practices demonstrates Primary Sense as quick to install and easy to learn. Should broader adoption occur, the roll out of the tool to general practices will include a fully supported change management process and will not commence until 2022.

WA Primary Health Alliance (WAPHA) has already successfully led a national project on behalf of PHNs in the development – and now ongoing operations - of Primary Health Insights, and has agreed to work with Gold Coast PHN to investigate the broader application of Primary Sense. WAPHA is therefore well placed to support PHNs considering its adoption, as well as lead the scaling up of the tool and its hosting within Primary Health Insights.

There is public benefit to PHNs having a data extraction tool independent of commercial providers to support GPs with greater analysis and interpretation of their data. This has been particularly important during the COVID-19 pandemic as GCPHN has been able to rapidly program Primary Sense to deliver functionality to support GPs assessing vulnerable patient cohorts at greatest risk of poor health outcomes if they are contracting COVID-19.

I believe that there is considerable public benefit to PHNs developing tools such as Primary Sense to better support general practitioners improve health care in communities across Australia.

Sincerely,



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