

9 November 2021

Ms Gemma Smith
Competition Exemptions Branch
Australian Competition and Consumer Commission
Email: exemptions@accc.gov.au

AA1000577 – WAPHA – submission

Thank you for the opportunity to provide a submission on the above application for authorisation from the WA Primary Health Alliance (WAPHA).

The Consumers Health Forum of Australia (CHF) supports the application to allow the activities of the proposed Primary Sense Project to proceed. The Primary Health Networks (PHNs) were established by the Commonwealth Government to provide coordination of primary health care services and to improve the delivery of those services within their region. Collaboration within the region is encouraged.

This project places that sharing process into a more formal arrangement. CHF believes that this is exactly the sort of activity PHNs should be pursuing to support improvement in general practice which ultimately means better health outcomes for the community. There are 31 PHNs across the country and it makes sense for them to share resources and tools to perform that function; indeed, it is written into their grant guidelines.

CHF cannot see any detriment for consumers in the proposal. PHNs are commissioners and the proposal would improve the quality of the data that informs that commissioning. The PHNs are not in competition with each other having clearly delineated regions to operate within and they are not competing with other service providers.

CHF believes there are sufficient safeguards in place to protect consumer privacy and the integrity of their health data given the work involves de-identified data.

Yours sincerely



Leanne Wells
Chief Executive Officer

Consumers shaping health

PO Box 73
Deakin West ACT 2600

Ph: (02) 6273 5444
Fax: (02) 6273 5888

www.chf.org.au