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Dear Dr Goodall

### **Review of the Health Act 1958 – A new legislative framework for public health in Victoria**

Thank you for the opportunity to comment on this discussion paper. On behalf of NHMRC I would like to offer the following comments.

#### *3.4.1 Principle of evidence-based decision-making*

The NHMRC supports the inclusion of this principle in the legislation where possible. The NHMRC would like to draw particular attention to the inclusion of socio-economic evidence in health policy deliberations. The NHMRC has developed a toolkit *Using socio-economic evidence in clinical practice guidelines* (2003) and recommends this as a model to be applied to health policy development. The toolkit can be found on the NHMRC website at: <http://www.nhmrc.gov.au/publications/synopses/cp65syn.htm>

#### *5.2 Privacy protection for health information*

The NHMRC has undertaken a survey amongst its stakeholders to determine the level of knowledge of the health information privacy protection framework. The survey has confirmed high levels of confusion in the health care and research communities largely as a result of the patchwork of legislation, both Commonwealth and State/Territory, overlaid by a variety of administrative decisions and codes of practice.

The NHMRC believes that actions which simplify health information privacy protection are to be commended.

#### *6 Health impact assessments*

The NHMRC has a history of action in this field. For example the publication noted at 3.4.1 above.

More recently, the NHMRC has been a case study partner in a project funded by the Commonwealth Department of Health and Ageing to develop a framework for equity-focussed health impact assessment. In keeping with NHMRC's commitment to the inclusion of socio-economic evidence, the NHMRC believes that maintaining an equity focus in impact assessment is important and recommends that this be considered for inclusion in any statements about health impact assessment.

It is suggested that you contact the Chief Investigator Dr Rosemary Aldrich, Newcastle Institute of Public Health (email [raldrich@mail.newcastle.edu.au](mailto:raldrich@mail.newcastle.edu.au)), for more information about the equity-focussed framework. You may not be aware that the European Union has just released a manual entitled *European Policy Health Impact Assessment: A Guide* a copy of which is enclosed. You may find this of interest.

*8.8.11 Diseases covered by immunisation status certificates*

*8.9.3 Exclusion of children during an outbreak*

The NHMRC is pleased that NHMRC standards are referenced in the discussion paper and agrees that it would be useful to reference the same in the legislation. However, the NHMRC is aware that the titles and dates of standards change from time to time and any reference should be to "NHMRC guidelines in force at the time" (or similar wording) rather than to a specific title.

*9.1.2 Protection of water supplies*

It is suggested that reference be made to the NHMRC *Australian Drinking Water Guidelines* as part of the quality control framework for drinking water quality.

I trust this information is of assistance to you.

Yours sincerely



Professor Alan Pettigrew  
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