13 October 2021

Mr Steven Issa  
Chief Digital Officer  
Australian Digital Health Agency

By email to: mhealth@digitalhealth.gov.au

Dear Mr Issa

Re: mHealth Applications Assessment Framework Consultation

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide feedback on the draft National mHealth Applications Assessment Framework (the framework).

The RANZCP is the principal organisation representing the medical specialty of psychiatry in Australia and New Zealand and is responsible for training, educating, and representing psychiatrists on policy issues. The RANZCP has over 7300 members including more than 5300 qualified psychiatrists. Psychiatrists are clinical leaders in the provision of mental health care in the community. We provide care to patients in person and via telehealth services.

The RANZCP acknowledges the Australian Digital Health Agency’s commitment towards ensuring mHealth applications are safe, high-quality, and trustworthy. We note there is an opportunity to ensure the framework is easy for practitioners to understand and is consistent with the National Safety and Quality Digital Mental Health (NSQDMH) Standards and other applicable digital regulations. Due to the rapid pace of technological change, the framework should include a review process to ensure mHealth applications are operating within current guidelines.

The RANZCP emphasises the importance of protecting patient privacy and sensitive medical data. We suggest the framework criteria include a provision for developers to ensure their application meets current security standards and uses industry standard encryption to protect data. Furthermore, it is essential that vendors disclose any third-party services they use to build or maintain their applications, for both security and transparency. Third-party services present a significant risk to breaches of patient privacy.

To discuss any of the points raised, please contact Rosie Forster, Executive Manager, Practice, Policy and Partnerships Department via rosie.forster@ranzcp.org or by phone on (03) 9601 4943.

Yours sincerely

Associate Professor Vinay Lakra  
President

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