15 September 2020

Protecting Critical Infrastructure and Systems of National Significance

Thank you for the opportunity to provide input to the consultation on Protecting Critical Infrastructure and Systems of National Significance.

The Royal Flying Doctor Service (RFDS) is a vital part of remote and rural communities, providing critical health services to areas of great need, particularly in places where low population numbers make it unviable to support local health services. This includes hospitals, emergency departments, pharmacies, General Practitioners and other primary healthcare services.

The RFDS is contributing to this consultation as a service that provides health care throughout Australia, relying on not only critical health infrastructure but also aviation infrastructure and telecommunications infrastructure that is vital to enabling the delivery of many RFDS services, particularly in rural and remote parts of our country.

For example, in 2018/19 the RFDS provided almost 96,000 telehealth consultations (remote consultations) making the RFDS one of the largest providers of GP delivered telehealth services in Australia. Remote consultation calls come into one of our 23 RFDS bases from individuals or health workers in remote and rural Australia who are seeking medical assistance or advice. The calls predominantly originate from areas where there is a significant absence of medical and other infrastructure, requiring that RFDS doctors resolve concerns and set treatment plans over the phone, or determine the need for an aeromedical retrieval. Around 99% of RFDS remote consultations are delivered over the phone, indicative of the relative reliability and affordability of telephone services compared to other mediums, particularly in emergency situations.

There is also growing use, particularly during the COVID-19 pandemic period, of videoconferencing (e.g. Zoom, Skype) for the delivery of health services in rural and remote areas. This includes for a range of services such as consultations with medical specialists, as well as with mental health clinicians and General Practitioners. Apart from being essential during the pandemic, this can be significantly cost effective for patient with reduced travel times to access care. It is also valuable for rural isolated health professionals, and provides opportunities for coordinated care between patients, rural clinicians and specialists, who are often located at major metropolitan hospitals. It is with our significant remote consultation and growing telehealth services in mind that the RFDS highlights telecommunications as a critical area for protection in conjunction with and alongside broader health infrastructure.
Further to the need to ensure adequate protections of essential health infrastructure, the experience of the COVID-19 pandemic has highlighted the potential impacts of an interrupted supply chain for essential medical equipment, such as personal protection equipment (PPE). The RFDS was an essential partner of the Australian Government tasked with aeromedical retrievals for patients with confirmed or suspected cases of COVID-19. Within the first 2 weeks of the pandemic period, the RFDS transported over 200 patients. This activity rapidly consumed RFDS PPE stores and significant work was required to secure additional supplies. Such changes in demands or disruptions to the supply chain of this type of equipment has significant potential risks for essential health workers, as well as to the communities where services are being provided.

Lastly, the RFDS supports the Australian Governments focus on investment in cyber security and the implementation of the new Cyber Security Strategy 2020. The increasing incidents and risk in the health industry are of significant concern to the RFDS and as a result we too, like many others in the health and other sectors, are increasing our investment in cyber security as more services and systems continue to move online.

I would be pleased to discuss further any of the matters raised in this submission.

Kind regards,

Frank Quinlan
Federation Executive Director