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# LEGAL E-BULLETIN

VOLUME 29 (SG) 24/03/2026

**Dear Readers,**

Singapore has clarified its position on the sharing of patients' health information with insurers. In recent statements, the Ministry of Health (MOH) confirmed that patients must be notified and their consent obtained before relevant health information is shared with insurers.

In this E-Bulletin, we highlight the key clarifications, explain why they matter, and outline practical considerations for affected organisations.

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## SINGAPORE: Sharing of Health Information with Insurers Notification and Consent Requirements Clarified

### 1. What has been clarified?

The MOH has clarified that patients must be informed and must give consent before their health information is shared with insurers. This applies to the disclosure of medical information for insurance-related purposes, including underwriting and claims processing.

Importantly, the requirement to notify and obtain consent applies even where the information is relevant to an insurance policy or claim. Consent cannot be assumed simply because an individual holds an insurance policy or participates in an employer-sponsored group insurance scheme.

### 2. Distinction between healthcare data-sharing and insurer access

At the same time, Singapore is moving towards more structured and, in some cases, mandatory sharing of key health information within the healthcare system itself, aimed at improving continuity of care and patient outcomes. Healthcare service providers will be required to contribute and share certain health information within the national healthcare framework.

However, this healthcare-driven data-sharing does not extend to insurers. Access by insurers to patients' health information remains subject to notification and consent, reflecting the different purposes and risks associated with commercial use of health data as opposed to healthcare delivery.

### 3. Why does this matter?

Health information is among the most sensitive categories of personal data. The clarified position underscores the importance of transparency and patient autonomy in decisions about how such information is used and shared.

Failure to comply with notification and consent requirements may expose organisations to regulatory scrutiny and reputational risk, particularly where health information flows between multiple parties such as healthcare providers, insurers, employers and third-party administrators.

### 4. Who is affected?

These clarifications are particularly relevant for:

- insurers handling medical information for underwriting or claims purposes;
- employers offering group health insurance or medical benefit schemes;
- HR teams involved in managing employee medical information;
- healthcare providers sharing patient information with insurers; and
- third-party administrators and service providers supporting insurance or



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healthcare arrangements.

Any organisation involved in the collection, use or disclosure of health information should review its practices in light of these developments.

**5. What should organisations be doing now?**

Organisations should consider whether:

- patients or employees are clearly informed about what health information may be shared with insurers and for what purposes;
- consent is expressly obtained before such information is disclosed;
- consent processes are properly documented and integrated into insurance and HR workflows; and
- contractual arrangements between insurers, employers, healthcare providers and service providers clearly address responsibilities for notification and consent.

With the Health Information Act expected to take effect in early 2027, organisations are well advised to align their practices early with the direction of Singapore's evolving health data governance framework.



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