

10 May 2011

Committee Secretary  
Senate Standing Committees on Community Affairs  
PO Box 6100  
Parliament House  
Canberra ACT 2600  
Australia

[community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Sir/Madam,

**Re: National Health Reform Amendment (National Health Performance Authority) Bill  
2011**

National Seniors Australia (National Seniors) is the largest organisation representing Australians aged 50 and over, with a quarter of a million members nation-wide. This broad-based support enables National Seniors to provide a well-informed and representative voice to government, business and the community on issues of concern for people aged 50 and over.

National Seniors welcomes initiatives which will improve the standards and performance of health providers and ensure health consumers have access to quality, timely and responsive health and allied health care. For this reason, we are supportive of the Bill seeking to establish a new statutory authority, the National Health Performance Authority (NHPA), to provide independent monitoring and reporting of the performance of important elements of the health system.

We understand the NHPA will be responsible for reporting against clinical safety and quality performance standards developed by the Australian Commission on Safety and Quality of Health Care (ACSQHC) (established under the *National Health and Hospitals Network Bill 2010* passed by the House of Representatives with Senate amendments on 21 March 2011) and the production of reports on waiting times, adverse events, patient satisfaction and financial management in public and private hospitals.

In its current form, the Bill could be interpreted as being limited to medical, dental and pharmaceutical services. In view of the value of primary care, integrated and holistic approaches for improving health outcomes, prevention, early intervention, well-being and the likely reduction of the need for re-admission, National Seniors would like to see the Bill provide greater clarity and definition around allied/primary health and its place in the measurement and reporting of performance of health services. In this regard, we concur that a broad definition of

health should be included as suggested by the National Primary Health Care Partnership in its submission.

National Seniors welcomes the public reporting of information through new hospital performance reports and healthy community reports that will be available for Australians to see on the internet. However, we believe that the monitoring and reporting should not just be health service based but should also include mechanisms for collecting consumer feedback about their experiences and the quality of care they receive which are equally important in identifying areas of poor performance. This is in line with statements made by Professor David Pennington and the Consumer Health Forum in separate submissions to this Bill pointing out that waiting lists and emergency waiting times are not the best and only measures of quality.

National Seniors would like clarification in the Bill as to how the NHPA, a Commonwealth agency, will be able to access and obtain relevant data from the many health care services currently being provided by State and Territory Governments, non-government organizations and private practitioners, to make it sufficiently comprehensive and comparable. We also note that no arrangements for the reporting of private hospitals appear and would seek some greater indications on how this will be addressed (mindful of limitations of the Commonwealth's jurisdiction in this regard).

National Seniors notes that consumer representation on the NHPA is not mandated in the legislation. We would suggest that the inclusion of a consumer representative on the NHPA should be considered as being of value. Finally, section 122 of the Bill allows for disclosure with consent. National Seniors would like to see the inclusion of 'informed consent' in this provision.

We hope you find these suggestions helpful. Should you have any queries please do not hesitate to contact Dr Liz Curran, Director of Policy on (02) 6230 4588.

Yours sincerely,

**Michael O'Neill**  
**Chief Executive**