

30 April 2009

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

Dear Sir,

**Re: Inquiry into National Registration and Accreditation Scheme for Doctors and Other Health Workers**

The Australian Council on Healthcare Standards (ACHS) makes the following comments to the Committee in relation to the above referenced inquiry. The establishment of the proposed scheme is not a core issue for ACHS but it has a strong interest in promoting a nationally consistent approach in relation to issues that impact on the agenda around quality and safety in the provision of health services. This proposal impacts on that broader agenda.

ACHS as you may be aware is a 'not for profit' private company limited by guarantee established in 1974. It is effectively owned by the health industry. It is governed by a Board and Council comprising representatives from 30 organisations including Governments, professional colleges, peak industry associations and consumers. It has a modest financial footprint and most of the activities it undertakes and services it delivers are provided at minimal or no cost due to the voluntary contribution of time and expertise by organisations and individuals across the health industry. Within a regulatory framework it is based on a self regulatory model. For a more detailed commentary on regulatory frameworks and their application to the health industry refer to the publication:

Braithwaite J, Healy J and Dwan K (2005) The governance of health safety and quality: a discussion paper, Canberra, Commonwealth of Australia.  
(<http://www.health.gov.au/internet/safety/publishing.nsf/Content/home>)

In principle the development of the national scheme including both registration and accreditation is supported. Whilst there are obviously substantial variations across the different environments that need to be recognised and taken into account in devising the delivery strategies for the proposal, experience gained by ACHS in conducting the national accreditation program for the major component of the health care industry since 1974 is that the issues and requirements are the same. However, they do require local application in a way that is sympathetic and relevant to the environment.

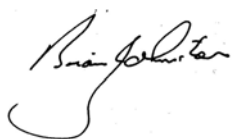
The proposal for national registration offers substantial benefits through such mechanisms as a possible single point of legislation, common management systems and for health professionals the ease in moving across various jurisdictions.

However, it is in respect of the accreditation scheme proposal that ACHS seeks to make particular comment:

- Effective engagement with the various health professions is most effectively achieved using a self governance model.
- Government has a legitimate and important role in expressing the public's and policy expectations for the accreditation of health professionals.
- Health professionals should be responsible and accountable for establishing and managing the accreditation requirements within the policy framework set by government. An excellent example of how such an approach can be structured is the arrangements that apply in The Netherlands; a summary of this can be found in a recent publication by the European Observatory on Health Systems and Policies: *Assuring the quality of health care in the European Union: a case for action*, Helen Legido-Quigley et al, World health Organisation 2008 ([www.who.euro.int](http://www.who.euro.int))
- A partnership based on mutual respect for the respective policy and professional expectations of the parties involved will maximise the potential for success in application.
- Professional colleges are the logical body to be responsible for accrediting health professionals

The foregoing comments are underpinned by the knowledge and insights gained by ACHS through its various accreditation programs, most notably its Evaluation and Quality Improvement Program (EQulP) that now has approximately 1200 participating organisations nationally covering both the public and private sectors.

Yours sincerely



**BW Johnston**  
Chief Executive