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1 May 2009

Committee Secretary
Senate Standing Committee on Community Affairs
Parliament House
Canberra ACT 2600

Dear Committee Secretary

Submission to the Senate Inquiry into the National Registration and Accreditation Scheme for the Health Professions

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide a Submission to the Senate Inquiry into the National Registration and Accreditation Scheme for the Health Professions.

CHF urges the Australian Government to implement the National Registration and Accreditation Scheme as planned on 1 July 2010 as a national Scheme will provide consistency to improve safety and quality of health care.

The proposal for the Scheme provides an excellent base for addressing current system inconsistencies across States and Territories and across health professions and, in doing so, improving patient care and safety and consumer confidence in the health care system.

CHF is very keen to meet with the Senate Committee to expand on consumer views regarding the importance to consumers of the Government implementing a National Registration and Accreditation Scheme by 1 July 2010. CHF's comments largely relate to the impact of the scheme on patient care and safety.

Yours sincerely

Signed

Carol Bennett
EXECUTIVE DIRECTOR



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Executive Summary

The Consumers Health Forum of Australia (CHF) welcomes the establishment of a National Registration and Accreditation Scheme for the health professions as it will take safety and quality to a new level in Australia. CHF urges the Australian Government to implement the Scheme, as planned, on 1 July 2010.

CHF supports the Scheme's national approach to registration, accreditation and health complaints as it will address the current inconsistencies across States and Territories.

CHF applauds the commitment to public reporting of health professional registration, accreditation, areas of speciality and limitations on practice in the Scheme as it will help consumers access the most appropriate professionals to address their concerns. This will improve patient care and safety and provide public confidence in the health care system.

CHF is very keen to meet with the Senate Committee to expand on consumer views regarding the importance to consumers of the Government implementing a National Registration and Accreditation Scheme by 1 July 2010. CHF's comments largely relate to the impact of the Scheme on patient care and safety.

Recommendations

Recommendation 1

CHF recommends that the National Registration and Accreditation Scheme is implemented, as planned on 1 July 2010, with a focus on national registration, accreditation and health care complaints.

Recommendation 2

That the public register provides current, timely and sufficient access to information for consumers about the registration status of their health professionals to protect public safety and inform consumer choices about their health care providers.

Recommendation 3

The register is made publicly available through a one-stop national resource for consumers such as a website, with a telephone inquiry line for further information or assistance or for people who do not have or use the internet.

Recommendation 4

To ensure public accountability, accreditation information should be made publicly available and understandable for consumers.

Recommendation 5

To ensure that the national complaints process works for consumers, CHF recommends that it include:

- An independent process for assessing, investigating and prosecuting health professional conduct
- The same ‘one-stop shop’ where consumers can raise concerns and lodge confidential complaints where information is available on a website with a telephone inquiry line for further information for people without the internet
- Strategies to assist consumers to navigate through the complaints system.
- A flow chart that clearly outlines all options and pathways.
- A person appointed to be responsible for assisting consumers through the process.
- Links to the National Charter of Healthcare Rights with complaints arrangements.

Recommendation 6

Community members on national boards require support to effectively fulfil their role.

Introduction

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide a Submission to the Senate Inquiry into the National Registration and Accreditation Scheme for the Health Professions. Health consumers' perspectives provide an important balance to the views of health care professionals, service providers and industry.

CHF supports the national Scheme's commitment to improving patient care and safety through national registration, accreditation, health care complaints and providing health care consumers with information through a public register.

This submission focuses on the areas of the Senate Inquiry that are most relevant to health consumers. CHF comments are based on consultations with member health consumer organisations and their networks and consumer representatives.

Key Issues

Recommendation 1

CHF recommends that the National Registration and Accreditation Scheme is implemented, as planned on 1 July 2010, with a focus on national registration, accreditation and health care complaints.

Improving patient care and safety

The Intergovernmental Agreement (IGA) for the National Registration and Accreditation Scheme for the Health Professions (NRAS) outlines three guiding principles for the scheme:

- The safety of the public is paramount
- High quality health care must be protected and advanced, and
- Governance should be accountable and processes transparent.

CHF applauds these guiding principles as safety and quality of health care and public accountability are essential.

CHF is guided by the view that *everyone has the right to safe, good quality health care* and believes that if the Scheme is implemented as planned, it will help to improve patient care and safety. This is through:

- National registration and accreditation of health professionals.
- Providing information to health consumers about the registration, accreditation, area of speciality and limitations on practice to health consumers through a public register

- Linking accreditation and registration so that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.
- Linking quality assurance, education and training processes and registration requirements with analysis of complaints, ensuring a continuous improvement process of health care.
- Simplifying the complaints process for consumers through a national process.
- Establishing the opportunity for consumers to contribute to accreditation of health professional education and training through community members on national boards.
- Embedding continuous improvement processes.
- Allowing an unprecedented opportunity for consistent monitoring of health professional conduct across States and Territories as well as across a range of disciplines.

What should be on the register

CHF welcomes the Scheme's proposal to make information about health professionals publicly available to consumers through a public register.

The public register will provide consumers with a central place to find information on health professional registration, accreditation, areas of specialty and limitations on practice. CHF strongly believes the information on the public register will improve patient care and safety by:

- Providing information to help consumers make informed decisions about their health care, including who they should see for particular advice, conditions and procedures.
- Ensuring that health care professionals (including overseas trained health care professionals) do not claim to be specialists in areas that are not recognised in Australia, and therefore do not meet appropriate standards and qualifications.
- Protecting consumers from seeing health care providers who are unable to offer them the advice or treatment they require or who are unregistered.

CHF supports legislation for the national Scheme specifying the names of practitioners de-registered for conduct reasons be shown on the public register with an indication that they have been de-registered for conduct reasons.

CHF welcomes the Australian Health Ministers commitment to improving the safety of the public through the Scheme by implementing mandatory reporting of health professionals who are placing the public at risk and mandatory criminal history and identity checks of any health professional wishing to register¹.

¹ As outlined in the Australian Health Ministers' Conference Communiqué – 5 March 2009
<http://www.health.gov.au/internet/main/publishing.nsf/Content/mr-yr09-dept-dept050308.htm>

CHF would like to see more direct requirements in the legislation on the minimum information on the public register. For example, it is important for consumers to be able to identify the health professional they are seeing from the register, which means that business locations are important for the public register, not only the postcode details of the person's home or company address.

It is crucial that the register prevents health care professionals claiming specialist qualifications inappropriately, such as overseas trained doctors claiming to be surgeons, especially in the cosmetic industry. All health professionals must meet Australian national standards, not overseas 'equivalent' standards.

Recommendation 2

That the public register provides current, timely and sufficient access to information for consumers about the registration status of their health professionals to protect public safety and inform consumer choices about their health care providers.

Access to the register

Current, timely and sufficient information for consumers about the registration status of their health professionals is a key component of a robust system, designed to protect the public.

To support this, CHF recommend that the public register is made available to consumers as a one-stop national resource for consumers such as a website, with a telephone inquiry line for further information or assistance, or for people who do not have or use the internet. This will help to ensure that geographically isolated consumers, consumers without the internet and consumers with hearing and vision impairments can access the service.

Whether the national resource for consumers includes a portal website like www.healthinsite.gov.au or a front end through the national agency with the boards uploading current information to the back end in a similar way to www.privatehealth.gov.au or some other technological solution, the legislation will need to ensure that the boards provide appropriate registration information and keep it current.

The public register could also provide a place for consumers to raise concerns about health professionals while being sure that their health care will not be compromised.

Recommendation 3

The register is made publicly available through a one-stop national resource for consumers such as a website, with a telephone inquiry line for further information or assistance or for people who do not have or use the internet.

Training and accreditation

CHF supports the national Scheme linking accreditation and registration so that only practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

A major benefit for consumers of the national Scheme is the opportunity for consumers to contribute to accreditation of health professional education and training. CHF welcomes the proposal that the Ministerial Council require that accreditation committees include two community members and that the Ministerial Council require that the process by which the national boards select members for an accreditation committee be open and transparent.

CHF agrees to the proposal that the Ministerial Council specify that it would be open to boards to delegate to external accreditation bodies or committees other functions related to accreditation or other matters for which the boards have responsibility, but the boards would not be required to do so. This would allow local knowledge to feature in decision-making processes. However, this delegation should include requirements for appropriate community involvement in the delegated functions.

CHF also emphasises the importance of entry standards and mechanisms for health professional courses that ensure under-represented communities such as people from culturally and linguistically diverse and Indigenous backgrounds are not prevented or discouraged from training as health professionals. Consultations with these communities in designing health education courses, as well as their involvement in accreditation of the courses, will be critical in improving health outcomes in Australia especially for vulnerable groups.

Recommendation 4

To ensure public accountability, accreditation information should be made publicly available and understandable for consumers.

Complaints processes

CHF welcomes the establishment of a complaints process as part of the national Scheme as it provides an unprecedented opportunity for monitoring health professional conduct across states and territories as well as across a range of disciplines.

The information collected would provide a valuable resource to inform the continuous improvement of health care training programs and practice requirements, not only for individual disciplines but for interdisciplinary activities and future health workforce planning.

The system through which complaints are handled should be well-linked to accreditation and registration processes in order to influence change in response to recurring and systemic issues. Issues should be identified from assessment of all complaints lodged, not only those requiring disciplinary action.

CHF also supports the proposal for a national complaints system as it will simplify the complaints process for consumers. Currently there is no guide to how the complaints system works and the different ways to access it. Consumers often have difficulty knowing the appropriate place to raise their concerns and this causes frustration, often at the most vulnerable time – when they are ill.

Furthermore, consumers are finding themselves navigating a complex system with multiple players when making a report about an adverse event or incident. For example, many consumers are unaware that they can raise a complaint about health professionals conduct with professional registration boards or even that such boards exist.

There must be independence in assessing, investigating and prosecuting health professional misconduct. People and/or organisations involved in this must be able to demonstrate their independence from the issues and individuals which are the subject of the complaint.

Health complaints systems that are appropriately resourced and have well-developed links between different bodies reassure consumers and health professionals that their reports are taken seriously and investigated appropriately. The significant role of consumers in the health complaints process must be recognised.

Recommendation 5

To ensure that the national complaints process works for consumers, CHF recommends that it include:

- An independent process for assessing, investigating and prosecuting health professional misconduct
- A ‘one-stop shop’ where consumers can raise concerns and lodge confidential complaints where information is available on a website with a telephone inquiry line for further information for people without the internet
- Strategies to assist consumers to navigate through the complaints system.
- A flow chart that clearly outlines all options and pathways.
- A person appointed to be responsible for assisting consumers through the process.
- Links to the National Charter of Healthcare Rights with complaints arrangements.

The role of community board members and the need to support them in fulfilling these roles

CHF welcomes the inclusion of at least two community members on the national board for each profession as set out in the Intergovernmental Agreement (IGA). This is an important step in building community confidence in the Australian health workforce.

If community membership of professional boards is to be effective as a process for building community confidence in the health profession and the Scheme, the community members on the professional boards must be able to reflect the viewpoints and concerns of consumers and be persons in whom the community has confidence. Community members on national boards and committees will require initial and ongoing support in order to fulfil their role. Support includes training on the role and expectations of community representatives, the role of the board and the national Scheme.

Community members will benefit from opportunities to meet with each other and share best practice, and continue to learn from the experiences of implementing the Scheme. CHF recommends that practical ways for community members to interact with each other are included in the design of the Scheme. This could include regular community representative meetings and a community member website that allows members to access information, discuss ideas and request support.

Recommendation 6

Community members on national boards require support to effectively fulfil their role.

Summary

Australia currently has an important and exciting opportunity to take safety and quality to a new level in Australia.

Consumers want the Scheme to close the gaps and inconsistencies between the states and territories and the health professions and provide them with information about their health professionals to help them to make informed decisions about their health care.

To achieve this, the Australian Government must invest in including consumers, with their unique and valuable perspectives, as partners in the implementation of this important Scheme.

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Background information

The Consumers Health Forum of Australia Inc (CHF) is the national voice for health consumers. As an independent non-government organisation, CHF helps shape Australia's health system by representing and involving consumers in health policy and program development.

Health consumers have a unique and important perspective on health as the users and beneficiaries of health care and, ultimately, those who pay for it. CHF takes consumers' views to government and policy makers, providing an important balance to the views of health care professionals, service providers and industry to achieve a health system that reflects the needs of all stakeholders.

CHF member organisations reach millions of Australian health consumers across a wide range of health interests and health system experiences. Health policy is developed through wide consultation with members, ensuring a broad, representative, health consumer perspective.

Current priorities include safety and quality in health care, safe and appropriate use of medicines and health care for people with chronic conditions. CHF also facilitates the appointment of consumer representatives on over 200 national health-related committees.

CHF believes all consumers should receive affordable, safe, good quality health care at the time they need it. The best outcomes are achieved when consumers are involved in decisions about and management of their own health care. Consumers should receive health care information when they need it in a form they can understand, particularly about using medicines.

Established in 1987, CHF receives funding from the Australian Government Department of Health and Ageing and membership fees. It seeks external funding for priority projects.

With its ability to access a variety of health consumer networks and extensive knowledge of consumer issues, CHF is a respected and influential contributor to the Australian health debate.

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