

Australian Nursing and Midwifery Federation submission to the

**Australian Commission on Safety
and Quality in Health Care
(ACSQHC) consultation on the
draft Sustainable Healthcare
Module**

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Australian
Nursing &
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Federation



Australian Nursing and Midwifery Federation submission

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INTRODUCTION

The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 320,000 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

The ANMF welcomes the opportunity to provide feedback on the draft Sustainable Healthcare Module. The ANMF acknowledges that climate change is occurring due to human activities, in particular the large scale burning of fossil fuels for energy, which emit carbon dioxide into the atmosphere. To mitigate the effects of climate change, the international community, particularly the developed world, needs to reduce carbon dioxide emissions by transferring reliance on fossil fuels to renewable sources of energy production and reduce energy use per capita.

According to the World Health Organisation, climate change is the single biggest health threat facing humanity.¹ The healthcare sector in Australia contributes an estimated 7% to our total greenhouse emissions² and many nurses, midwives and assistants in nursing are already affected both in their work and personal lives by climate change. In recent years, drought, bush fires and floods have significantly impacted healthcare services. These extreme weather events are becoming more frequent, leaving an enduring impact on physical and mental well-being and community resilience.



As the largest component of the healthcare workforce, nurses, midwives and care workers (however titled) are at the forefront of providing care to communities and individuals affected by climate change. Treatment of climate change-related health conditions are adding to the burden of an already stretched healthcare system. Grounded in science and providers of healthcare, the nursing and midwifery professions are in a position to communicate with the public and with their colleagues about climate change and the impacts on health. The International Council of Nurses identifies climate action in their list of 17 sustainable development goals ³ reinforcing the professional responsibility of all nurses and midwives to advocate for strategies and initiatives that reduce environmentally harmful practices and promote environmental justice and action on climate change.

The ANMF supports action and initiatives that address the challenges of climate change. Nurses and midwives are pivotal in leading the development of policy and influencing practices. Working in all areas of health and aged care, nurses and midwives contribute to resilient health systems through research, adaptation planning, the identification of at-risk populations and participating in emergency planning and surge response. In clinical, community and aged care health settings, nurses and midwives provide unique insight into practical sustainability and mitigation opportunities contained in energy and water efficiency, procurement, and waste management practices.

This submission addresses the relevant survey questions posed by the Australian Commission on Safety and Quality in Health Care regarding the draft Sustainable Healthcare Module. Further to this, the Commission can access the ANMFs Climate Change policy on the website at https://www.anmf.org.au/media/naddgkhu/p_climate_change.pdf.



Survey Question: Is there a need for the Module as it applies to health service organisations?

The ANMF supports action to reduce greenhouse gas emissions that ultimately lead to a healthier and more sustainable healthcare system. The draft Sustainable Healthcare Module presents a useful guide for healthcare organisations on how they might best reduce their carbon footprint and engage in sustainable practices, while embedding critical mitigation, adaptation and resilience strategies.

The ANMF believes the draft Sustainable Healthcare Module presents an effective, consistent national approach to addressing the issues of climate change and sustainability in health, especially when combined with broader strategies such as high-level policy development and embedding learning materials on climate change and action into pre and post-registration education for nurses and midwives. The Module presents a broad signal regarding the importance and relevance of audit and improvement across sectors, and highlights the relationship between climate change, health and quality care.

The impact of emissions does not begin and end at the door of a health facility. Those working in health, particularly in governance, should also be advocating for the reduction of the broader carbon footprint by investigating actions to reduce Scope 1, 2 and 3 emissions.⁴ Such actions might include: safe, accessible public transport that takes into consideration the safety of nurses, midwives and care workers who are employed as shift workers; the purchase of hybrid/electric car pool vehicles by area health services and facilities; and the provision of affordable housing for essential workers that is close to workplaces and reduces the need to use vehicles to get to work.

Addressing climate issues may feel insurmountable for many and the Module goes some way to addressing this. However, the ANMF believes an implementation guide to accompany the Module would assist healthcare workers and organisations in working toward meeting the actions within the Module and translating strategies into practical applications. An implementation guide could provide practical examples of strategies, guidance and resources outlining successful programs of emission reduction (including Scope levels 1, 2 and 3), case studies and lessons learned.



Survey Question: Do the actions in the Module address the key sustainability and climate-resilience concerns?

The module is comprehensive but as stated, an implementation guide would be helpful, especially if it provides concrete examples applicable to a range of facilities of varying sizes and geographical locations.

The impacts of climate change on health bring particular risks and responsibilities that need to be recognised and incorporated into the Module in ways such as those described below.

- Action one relates to the governing body. The responsibilities of the Governing body extend beyond maximising opportunities for sustainable healthcare and must include the oversight of risk, and fiduciary duty. Climate change is a foreseeable risk in healthcare including the associated financial implications for infrastructure, service provision and access. It is appropriate that Action One specifically includes climate risk as a part of the Governing body's responsibilities.
- The Governing body must be competent. Therefore it is essential the Governing body is trained and educated in accountability and the requirement to meet their responsibilities regarding oversight of risk and fiduciary duty. This requirement should be included and specified in Action four. Currently Action four only addresses the educational needs of the workforce.
- Action three relates to monitoring, reporting and process improvement. While climate risk is included in the intent and strategy, it is absent from the Action and should be integrated into Action three.
- One of the stated key principles underpinning the development of the Module is that each of the five actions relate directly to the safety and quality of patient care (p.5) but these links are not obvious in the Module. It would be helpful to include information about how the principle might manifest in patient safety through each of the actions. This would be particularly helpful if primary, secondary and tertiary levels were addressed.⁵



Survey Question: Are the language and the format of the document appropriate? If not, please provide suggestions.

The term 'low value care' would benefit from further explanation and examples. The term may cause confusion, particularly for those who are not health practitioners.

In the suggested strategies at Action five, the ANMF recommend that rather than using the term *patient* it would be preferable to refer to *people* or *those engaging with the healthcare system*. This encompasses families, carers, those accessing wellness, and other services who may not identify as patients.

Survey Question: Should the Module be assessed by independent external accrediting agencies?

The Module is not compulsory and therefore organisations may choose not to have the Module accredited, however, external accreditation would help to validate the strategies undertaken, especially if organisations were able to promote their climate action status.

External accreditation may place additional costs on an organisation, reinforcing the need for a clear rationale outlining the benefits of sustainable changes. Of concern, is the risk that external accreditation will not be accessed by organisations unless it is mandatory, evaluated alongside other healthcare standards and included in the overall cost of the health service or facilities accreditation.

Survey Question: Please provide any further comments in relation to the Module.

The Module states that workforce is an important element to the success of meeting and implementing strategies with education being an important element in the development of a shared vision and worker and community engagement. In order to succeed, there must be strong emphasis on providing the support needed by workers to plan, implement and evaluate climate action strategies. Such support must include appropriate funding, remunerated staff and allocation of time to engage in climate action, as well as inclusion in orientation programs that help to raise awareness and build understanding. Further to this, and given the size of their workforce and the critical role they play, nurses, midwives and assistants in nursing must be consulted to ensure planning accommodates the resources required to implement sustainable practice. Too often changes fail due to poor planning, staffing, resource allocation, communication and funding.



For clarity, it would be helpful to state the approach the Module uses, for example, is it a risk or quality based approach. This is not clear when reading the Module.

CONCLUSION

Thank you for this opportunity to provide feedback on the draft Sustainable Healthcare Module. Such a Module is welcomed. The ANMF supports measures that help to promote safety for those accessing healthcare, health practitioners and others employed in the healthcare workforce through sustainable healthcare systems and by identifying and implementing strategies to reduce carbon emissions in the healthcare sector.

REFERENCES

- ¹ The World Health Organization. "Climate Change and Health." no. 23 January 2023. (2023). <https://www.who.int/news-room/fact-sheets/detail/climate-change-and-health>
- ² Malik, Arunima, Manfred Lenzen, Scott McAlister, and Forbes McGain. "The Carbon Footprint of Australian Health Care." *The Lancet Planetary Health* 2, no. 1 (2018): e27-e35.
- ³ International Council of Nurses. "Sustainable Development Goals." Geneva: International Council of Nurses. <https://www.icnvoicetolead.com/sdgs/>
- ⁴ Bernoville, Tara. "What Are Scopes 1, 2 and 3 of Carbon Emissions?" *Academy*. (2022). <https://plana.earth/about>
- ⁵ Butler, Colin D, and David Harley. "Primary, Secondary and Tertiary Effects of Eco-Climatic Change: The Medical Response." *Postgraduate medical journal* 86, no. 1014 (2010): 230-34.