



australian nursing federation

8 October 2010

Ms Margaret Banks
Senior Programs Advisor
Consultation on National Safety and Quality Health Service Standards
Australian Commission on Safety and Quality in Health Care
GPO BOX 5480
SYDNEY NSW 2001

Dear Ms Banks

National Safety and Quality Health Service Standards

The Australian Nursing Federation (ANF) welcomes the opportunity to review the draft National Safety and Quality Health Service Standards (NSQHS Standards) prepared by the Australian Commission on Safety and Quality in Healthcare (ACSQHC) and to provide comment on the five new additional draft Standards.

With a membership of over 192,000 nurses, midwives and assistants in nursing the ANF is the largest professional and industrial organisation in Australia. Members of the ANF are employed in a wide range of settings in urban, rural and remote locations in both the public and private sectors.

The core business of the ANF is industrial and professional representation of our members and of the professions of nursing and midwifery.

The ANF participates in the development of policy relating to nurses and midwives on issues such as: practice, professionalism, regulation, health and aged care, community services, veterans' affairs, education, training, workforce, socio-economic welfare, occupational health and safety, industrial relations, social justice, human rights, immigration and migration, foreign affairs and law reform.

As stated in our previous submission to the ACSQHC (January 2010) the ANF supports the development of national standards which will provide a standardised measure of the safety and quality of care applicable across all health service organisations. The ANF agrees that the Standards will provide a guide to health service organisations of the level of care expected to be provided to improve overall patient care in health settings in Australia.

The ANF has argued that there should be mandatory application of the NSQHS Standards across all health services, regardless of perceived risk. The ANF is therefore disappointed to find that the latest draft NSQHS Standards document perpetuates a different approach for high-risk and lower risk health care facilities.

The ANF has sought clarification from the ACSQHC as to which body would be responsible for undertaking an educative role for organisations required to implement the NSQHS Standards in understanding the standards to be complied with; and to provide assistance where compliance has not been met. It is still not apparent from the role definitions provided on pages 18 and 19 of the draft ASQHS Standards document, which organisation has this responsibility. Without acknowledgement of this function within the role statement of an identified body, the ANF is concerned that this essential educative role could be omitted, with the result that the application of the NSQHS Standards will lack an important element in the quality improvement process.

The ANF supports the inclusion of the five additional draft Standards, namely:

- Partnering for Consumer Engagement
- Blood and Blood Product Safety
- Prevention and Management of Pressure Ulcers
- Recognising and Responding to Clinical Deterioration in Acute Health Care
- Preventing Falls and Harm from Falls.

The ANF is particularly pleased to see the incorporation of the Standard: *Partnering for Consumer Engagement*. The ANF has been a strong advocate for greater consumer participation in health and aged care planning and delivery and absolutely supports the notion that 'health systems are safer when consumers are involved in their design and delivery' and evaluation of those services. This includes consumer/community involvement at all levels of healthcare service planning and policy formulation, as well as participation of direct users of the services in providing evidence of the effectiveness of those services in terms of outcomes of care.

It is pleasing to see that the importance of the Standard: *Partnering for Consumer Engagement* is reinforced by positioning it alongside the *Governance for Safety and Quality in Health Service Organisations* Standard as forming a base for all the other Standards.

The other health care issues addressed in the additional NSQHS Standards are all areas that are critical to the delivery of safe, quality health care and therefore necessary inclusions.

The format of the draft NSQHS Standards now gives more clarity for the reader. The reordering of information more clearly articulates the actual Standard and its intent. The separation of Role statements into an overarching listing followed by specifics under each Standard is a welcome addition in the latest draft NSQHS Standards document.

There are no perceived gaps in the Standards that the ANF considers should be addressed nor unnecessary items or duplication.

The ANF looks forward to learning of the results of the Pilot Study scheduled for early 2011 and to being able to advise our members of the release of the final NSQHS Standards in July 2011.

Should you require any additional information or wish to discuss this matter further please contact Elizabeth Foley, Federal Professional Officer, on (03) 9602 8500 or elizabethf@anf.org.au.

Yours sincerely,



Lee Thomas
Federal Secretary

The industrial and professional organisation for nurses and midwives in Australia

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