

20 October 2010

Ms Naomi Bleeser  
Committee Secretary  
Australian Senate  
Community Affairs Legislation Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

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

Dear Ms Bleeser

**Re: National Health and Hospital Network Bill 2010; the Australian Commission on Safety and Quality in Health Care**

The Royal Australian and New Zealand College of Psychiatrists (the College) welcomes the opportunity to comment on the *National Health and Hospital Network Bill 2010* (the Bill).

The College is the professional body that represents over 4000 psychiatrists in Australia and New Zealand. The College sets the standards for psychiatry, trains and assesses against those standards as well as advocating and working with other organisations for fair, equitable and assessable mental health services for all.

The College supports the establishment of the Australian Commission on Safety and Quality in Health Care (ACSQHC) as a statutory, permanent and independent authority. The College values the work of the Commission on patient safety and quality improvement of health care and looks forward to further engagement around standards and accreditation.

The College suggests that consideration could be given to the following issues in consideration of the Bill:

- The title of the Bill is not descriptive of the contents may, over time, cause confusion as separate bills for the establishment of the Hospital Pricing Authority and the National Performance Authority are introduced. These Authorities are core components of the National Health and Hospitals Network structure, while the ACSQHC is an aligned structure. The Bill could be re-titled *Australian Commission on Safety and Quality in Health Care Bill 2010*.
- Given the alignment between these Authorities is essential, it is critically important that all three establishment bills are considered together to ensure effective regulatory interaction and clarity of roles and responsibilities. The College suggests that processes need to be established to ensure alignment.

- The Bill mentions consultation with the 'public' in a number of clauses. The College suggests that the phrase 'public' is retained but that explicit mention of consumers and carers is included in the Bill. This could be considered in Section 9 in relation to the functions of the Commission, in Section 10 in relation to the formulation of standards, guidelines and indicators and in Section 11 in relation to consultation around a model for a national accreditation scheme. The College, as an organisation, has embraced consumer engagements and believes that the ACSQHC will be strengthened by input from national consumer and carer groups.
- Finally, the College suggests amplification of Section 12(a) to ensure that the Commission is working with allied health, nursing and other health practitioners. The current wording could be construed as working solely with medically trained practitioners and dental practitioners.

The College would welcome an opportunity to discuss these views further with the Senate Standing Committee on Community Affairs. To arrange a meeting, or for clarification of any point raised in the submission, please contact Mr Andrew Peters, Chief Executive Officer [andrew.peters@ranzcp.org](mailto:andrew.peters@ranzcp.org) or (03) 9640 0646.

Yours sincerely

Dr Maria Tomasic  
**President**

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