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Consultation on NSQH Standards
Australian Commission on Safety and Quality in Health Care
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HCCA Response to the Consultation Paper on the Draft National Safety and Quality Healthcare (NSQHC) Standards

Background

Health Care Consumers' Association (HCCA) of the ACT was formed over 30 years ago to provide a voice for consumers on local health issues and now provides opportunities for health care consumers in the ACT to participate in all levels of health service planning, policy development and decision making.

Introduction

The Health Care Consumers' Association of the ACT (HCCA) welcomes the opportunity to respond to the Consultation Paper on the NSQHC Standards. We have sought views from our members and drawn on that input in preparing our response.

We consider accreditation to be an important tool in improving the quality of health services. We also support the idea that the involvement consumers in the accreditation process has the potential to bring about service wide improvements.

Response

HCCA believes the emphasis should be on achievable outcome measures as part of the NSQHC Standards as the basis for assessment and look forward to these being

developed soon. While the establishment of effective processes to support accreditation are important, we do not consider them to be the only measure of quality.

We support the objective of the Standards and support the areas addressed within the NSHQ standards. We see that these Standards have the potential to increase consumer confidence that minimum safety standards apply across all service settings. We are concerned however that the draft standards focus on compliance with safety requirements rather than encouraging continuous quality improvement.

Consumers want assurance that the treatment and care we receive is of a high quality. Safety is an important component of quality but not the only aspect that we consider to be essential to high quality care. We would like a comprehensive approach to accreditation that looks beyond safety of health services and include quality indicators. There are a number of organisations which accredit health services and include a range of quality indicators. We are interested to see how the NSQHC standards will be used to complement existing accreditation processes. We are concerned that the NSQHC Standards could be used in isolation as the only safety and quality requirements for accreditation. For example, HCCA has had an ongoing involvement with ACHS. A number of our members are consumer surveyors and we recently participated in working groups to review EQUiP 4. We are interested to see how NSQHC Standards complement the ACHS Standards and other standards used in health services.


Further to the need for a comprehensive approach to accreditation, we would like to see the language and definitions to be consistent across all health service accreditation standards. This will make the process more meaningful for health services and the community interested in the results.

Communication with the community about the NSQHC Standards and what they mean for consumers is an important aspect of implementation. We would encourage consideration of the development of a single site where information on a health provider's accreditation status can be accessed which would include the standards, a list of accredited health services, information on accreditation outcomes and links to relevant accrediting bodies. We also see a need for an accessible explanation of what the accreditation standards have measured and what that means for the consumer

We support the references to the Charter of Health Care Rights in the draft Standards but would like further consideration of the inclusion of specific references to consumer feedback and complaints management.

Finally, we would like to stress the importance of involving consumers in accreditation, including the development and review of standards, evaluation of implementation, and the inclusion of trained consumer representatives as part of review team. We strongly encourage consumer involvement in surveyor training and as surveyors on accreditation teams.

Thank you for your consideration of this submission.

A handwritten signature in blue ink, appearing to read "Darlene Cox", with a stylized, flowing script.

Darlene Cox
Executive Director