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Consultation on NSQH Standards  
Australian Commission on Safety and Quality in Health Care  
GPO Box 5480  
SYDNEY NSW 2001

To whom it may concern,

### **CONSULTATION PAPER ON NSQH STANDARDS**

Health Issues Centre welcomes the draft National Safety and Quality Healthcare Standards as a means to improve health consumer outcomes and safety.

Health Issues Centre provides nationally respected and leading policy, research, training and consultation on consumer participation in health. While currently assisting the Commission to gain consumer feedback on the Standards, the staff of Health Issues Centre wish to provide specific feedback from our collective decades of experience in health consumer research and policy.

Specific to the issue of consumer participation in health are the Elements A & E of Standard 1: Governance for Safety and Quality in Health Service Organisations (SQ).

Element A states:

**A. Governance and quality improvement system**

To ensure the best quality of clinical care and prevent avoidable harm to patients from treatment, health service organisations must have safe, effective and integrated corporate and clinical governance that includes safety and quality systems in place for managing the treatment and care of patients. These systems must be supported by learning driven by information, with staff trained and supported to ensure competency in their assigned governance responsibilities.

SQ: A Process Measure 1b states:

**1b.** Evidence of policies, protocols and procedures to address:

- clinical governance framework
- integrated risk management
- regulatory compliance
- system for ongoing data collection, analysis, trending and evaluation of management and operational practices for review at the appropriate level of the health service organisation
- clinical audit.

Health Issues Centre recommends that a dot point be added to SQ: A Process Measure 1b. That dot point could read:

- Consumer representation in clinical governance

SQ: A Process Measure 2a states:

- 2a.** Evidence that the roles, responsibilities and accountabilities for clinical safety and quality have been designed and assigned to the appropriate individuals.

Health Issues Centre recommends that this process measure be expanded to state:

- 2a.** Evidence that the roles, responsibilities and accountabilities for clinical safety and quality have been designed and assigned to the appropriate individuals, including consumer representation in clinical governance.

Standard 1, Element E states:

**E. Patient engagement and rights**

To support patient participation in their care, the health service organisation must enact the Australian Charter of Healthcare Rights and incorporate the principles of open disclosure if harm occurs

SQ:E 2 states:

- 2.** Implementing processes to enable patient participation in decision-making regarding their care, including informed consent to treatment.

The process measures for this standard do not include any reference to formal consumer participation at governance level, only patient involvement in decision making at the clinical level. This falls short of best practice in health consumer engagement. Health Issues Centre recommends that an additional Process Measure be added, which states:

**2.b Evidence of formal consumer representation in the development and review of patient feedback systems**

Health Issues Centre would also be interested in working with the Commission at the implementation stage for these standards. In particular our centre has expertise in collaborative methods of development and provision of information with and for consumers to enhance their capacity to make decisions regarding their care. Evidence shows the benefit of developing health information in collaboration with consumers (see Nilset et al 2006. *Methods of consumer involvement in developing healthcare policy and research, clinical guidelines and patient information material*. Cochrane Database of Systematic reviews, Issue 3).

Evidence also shows that decision-making is a process that needs to be supported by the service providers and that decision aids can help consumers in this process (see Victorian Department of Health recommendations in *Doing it with us not for us. Strategic Directions 2010-13*, published in 2009. p.33; O'Connor et al 2003. *Decision aids for people facing health treatment or screening decisions*. Cochrane Database of Systematic reviews. Issue 1).

As Health Issues Centre is the primary provider in Australia of training/consultancy to health services on consumer participation we may also be able to assist in the development of resources for the implementation of aspects of the Standards. This involvement may extend to the pilot study of the refined draft NSQH Standards due to commence in the first quarter of 2010. Health Issues Centre believes it is well placed to provide expertise and services in the area of consumer engagement to such a pilot study.

Yours sincerely,

A handwritten signature in black ink, consisting of several vertical strokes followed by a horizontal line extending to the right.

**Michael Janssen**  
CEO