

# Submission to the Australian Commission on Safety and Quality in Health Care

## Comments on the draft National Patient Charter of Rights Consultation paper, 22 January 2008

**Pharmaceutical Society of Australia**  
**7 March 2008**



PO Box 21, CURTIN ACT 2605  
Tel: 02 6283 4777 Fax: 02 6285 2869  
Chief Executive Officer: Kerry Deans

*The Pharmaceutical Society of Australia is the organisation that represents the professional interests of Australia's 16,000 pharmacists. It provides standards of practice, education, training and practice support for pharmacists and helps members of the profession to deliver quality health care to consumers.*

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The Pharmaceutical Society of Australia (PSA) provides the following comments on the consultation paper on a draft National Patient Charter of Rights.

### Key issues

- The introductory section of the consultation paper states that the charter will “support a shared understanding of the rights and responsibilities of patients, consumers and health care providers” (p. 2). In relation to this:
  - It is not clear how ‘patients’ and ‘consumers’ are to be distinguished in the context of this document.
  - We have found that the presentation and tone of the document focuses primarily on the ‘rights of patients’ and it was felt that the ‘responsibilities of patients/consumers’ and ‘rights and responsibilities of health care providers’ have not been addressed to the same level of detail.
  - If the document is intended to focus on the ‘rights of patients’, we would suggest the inclusion of statements describing the ‘responsibilities of patients’ since this would at least partly address the needs and understanding from the perspective of health care providers.
- PSA supports the eight key areas of the National Patient Charter of Rights described in the document (p. 5). It is our understanding that the document is intended to be relevant to the whole health care system and would therefore cover

both public and private health services. This being the case, we believe the rights relating to Access is somewhat out of place as it only relates to public health services. Would it be appropriate to revise this along the lines of consumers having the right to 'access health care in a timely manner'?

- PSA believes the way the National Patient Charter Principles (pp. 6–8) are structured and expressed with only the expectations of patients being described, in some instances, makes the document seem somewhat unbalanced or incomplete. For example, the opening sentence of Principle 2 on Respect states:

*There must be mutual respect, dignity and consideration between a patient and a health care provider.*

The section, however, is only expanded on by the inclusion of what the patient is entitled to. As this is a Patient Charter we accept that it may not be feasible to include a comprehensive list of what health care providers expect or are entitled to. However, we believe the inclusion of a further statement on how the second part of this two-way (mutual) process could be fulfilled would be useful.

- One of the core principles underpinning the professional behaviour of pharmacists is the statement under Principle ONE of PSA's Code of Professional Conduct (available at [www.psa.org.au/site.php?id=628](http://www.psa.org.au/site.php?id=628)):

*The primary concern of the pharmacist must be the health and wellbeing of both clients and the community.*

In some circumstances pharmacists may face the need to determine the likely outcome for an individual balanced by that for the community. PSA believes this concept could be included under one of the Principles of the proposed Charter.

## **Other comments on specific sections**

### **4. Communication**

- We believe people will have different expectations and perceptions of what would be regarded as "appropriate communication". We would therefore suggest the use of an alternative word under the first bullet point.

### **5. Information**

- For reasons similar to the comment above, we would suggest the use of an alternative word to "satisfies" under the fifth bullet point.
- In the second last sentence, how is it envisaged that health care providers will obtain information required to provide a service where the patient is unable or unwilling to provide that information?
- In the last sentence, it states "Patients are expected to follow plans...". Does this in any way contradict patient expectations relating to informed decision making and informed choices outlined under Principle 6 on Participation?

PSA appreciates the opportunity to provide comments during this consultation process. We would welcome the opportunity to be involved in any future consultations or initiatives in this area.