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Ms Margaret Banks
Head, Ambulatory Care
Australian Commission on Safety and Quality in Health Care
Email: mail@safetyandquality.gov.au

4th October 2007

Dear Ms Banks

**Joint submission regarding the second phase of stakeholder consultation:
*An Alternative Model for Safety and Quality Accreditation of Health Care***

The NSW Association for Adolescent Health (NAAH) and the Council of Social Service of New South Wales (NCOSS) thank you for the opportunity to provide a submission on *An Alternative Model for National Safety & Quality Accreditation Standards*. These comments expand on the feedback NAAH and NCOSS provided to the consultation forum held 28th March 2007 (morning session) and our joint written submission provided in March 2007.

The NSW Association for Adolescent Health Inc¹ and NSW Youth Health Services

The NSW Association for Adolescent Health Inc. (NAAH) is the peak body committed to working with and advocating for the youth health sector² in NSW to promote the health and well being of young people aged 12-25 years. NAAH aims to assist the youth health sector to strengthen and maintain its ability to provide relevant and evidence-based health services to young people aged 12-25 years.

The Council of Social Service of New South Wales³

The Council of Social Service of NSW (NCOSS) is an independent non-government organisation and is the peak body for the non-government human services sector in NSW. NCOSS works with its members on behalf of disadvantaged people and communities towards achieving social justice in New

¹ The NSW Association for Adolescent Health Inc.'s website: www.naah.org.au

² The Youth Health Sector includes any service/agency that works towards the betterment of the health and wellbeing of young people.

³ The website for the Council of Social Services New South Wales: www.ncoss.org.au

South Wales. NCOSS membership is composed of community organisations and interested individuals. Affiliate members include local government councils, business organisations and Government agencies. Through current membership forums, NCOSS represents more than 7,000 community organisations and over 100,000 consumers and individuals.

General Comments about the proposed Alternative Model⁴

NAAH and NCOSS congratulate the Commission on the lead they have taken in seeking reform of the accreditation system of health care services.

NAAH and NCOSS believe that the implications of accreditation, the development of national minimum standards and a national framework for quality improvement, requires further discussion in relation to the unique needs and funding arrangements of non-government organisations (NGOs). On page 21, “all settings of health care” does not provide a clear definition, and no reference is made in the paper to the applicability of these proposals to non-government organisations⁴. These organisations do not sit within the private or public/government domain.

In our original submission, NAAH and NCOSS noted that the Discussion Paper failed to mention the broad and extensive health NGO sector, which experiences varying levels of involvement in the accreditation process. Many NGOs, for example, have only recently commenced work on accreditation processes for their organisation and many organisations are yet to commence discussions about this issue. The proposed *Alternative Model* would have major implications for NGO health service providers, who provide everything from drug and alcohol services to youth health services through to sexual health education programs in the community.

We recommend that further development of the model explicitly include reference to and discussion of how the proposal and implementation of national minimum standards and a national framework for quality improvement will apply to and affect the Non-Government Sector. As we suggested in our original submission, we are concerned the Commission has missed a valuable opportunity to have greater feedback and involvement from the NGO sector. This may be a result of a lack of clarity provided on the definition of ‘health care provider’, and we recommend this be included in the *Alternative Model* document.

Furthermore, whilst NGOs appreciate the need for accreditation and the development of standards, additional funding will be required to support the implementation of these processes if service provision to clients is to be maintained at existing levels.

These are issues that need to be considered in future debates and consultations about national safety and quality accreditation system if clients’ health outcomes are to remain the focus behind any changes to the system. We are concerned by the suggestion that funders “may consider...funding or service suspension” where the failure to comply is a result of a lack of available funding and/or capacity to

⁴ Australian Commission on Safety and Quality in Health Care (2007) [Consultation Paper: An Alternative model for Safety and Quality Accreditation of Health Care](http://www.safetyandquality.org/internet/safety/publishing.nsf/Content/D6D45D8AE648AB2CA25729D001CC66C/$File/Consultation%20Paper%20Jul%202007.pdf). Online source: [http://www.safetyandquality.org/internet/safety/publishing.nsf/Content/D6D45D8AE648AB2CA25729D001CC66C/\\$File/Consultation%20Paper%20Jul%202007.pdf](http://www.safetyandquality.org/internet/safety/publishing.nsf/Content/D6D45D8AE648AB2CA25729D001CC66C/$File/Consultation%20Paper%20Jul%202007.pdf), Access date: 28.09.07.

undertake necessary processes, particularly as this may result in a decrease or lack of service to clients. Thank you for providing NAAH and NCOSS with the opportunity to provide comment on the implications of the proposed *Alternative Model for Safety and Quality Accreditation of Health Care*. We welcome the opportunity to discuss these matters further and to participate in future forums to address or further elaborate on these concerns.

Should you require further assistance, please do not hesitate to contact Vanessa D'Souza at NAAH on 02 9699 1033 or eo@naah.org.au, or Kristie Brown, NCOSS Senior Policy Officer on 02 9211 2599 ext 130 or Kristie@ncoss.org.au.

Yours sincerely



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Linda Frow
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**Council of Social Service of New South
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