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28 October 2015

Audiology Australia's comments regarding AHPA's response to the consultation draft Version 2 of the National Safety and Quality Health Service (NSQHS) Standards

Dear Meredith,

Thank you for coordinating and drafting an AHPA response to draft version 2 of the NSQHS Standards and for providing the member organisations with the opportunity to provide feedback.

Audiology Australia's comments regarding version 2 of the NSQHS Standards

Audiology Australia supports the version 2 of the National Safety and Quality Health Service Standards (the NSQHS Standards) and acknowledges the work of the Australian Commission on Safety and Quality in Health Care (the Commission) in revising the Standards.

In particular, Audiology Australia would like to acknowledge the improvements and efforts made by the Commission as regards:

1. The revised definition of the term 'clinician' as compared to version 1 of the NSQHS Standards. We believe that the new definition, which explicitly includes allied health practitioners, will increase the applicability and acceptance of the Standards by this important group of health care providers.
2. The changes to Item 1.1 of version 1 of the NSQHS Standards (Standard GS in version 2) which have resulted in a less-prescriptive formulation of the policies and procedures that should be included in the governance system (e.g. item GS4 in version 2). It is our opinion that this new formulation will better allow health service organisations delivering services in a range of settings to implement the Standards.
3. The focus on the importance of partnering with consumers when evaluating, revising and developing the health care organisation's safety and quality goals, as well as their own care (e.g. Actions GS5.1, GS9.1, GS10.1 GS10.2 and Standard PC in its entirety). This is in accordance with one of the four core principles of ethics upon which Audiology Australia's Code of Ethics is based: Autonomy- The client's moral right to make choices and decisions about one's course of action, as well as the right to Participation as stated in the Australian Charter of Healthcare Rights.

4. The increased clarity and requirements regarding the collaborative role of clinicians in the safety and quality improvement process, including:
- The new Action GS2.1d that now specifies that “the health service organisation supports clinicians to take action to improve the safety and quality of health care”.
 - Actions GS5.1b & c regarding the role of the workforce in the review of safety and quality systems.

Audiology Australia believes that empowering clinicians to take action will facilitate the rapid and effective improvement of safety and quality in health care as clinicians are uniquely placed to be able to identify areas in need of improvement. This is a significant improvement to version 1 of the NSQHS Standards (Standard 1) that had a much more ‘top-down’ governance tone which implied that clinicians would be monitored for compliance but not actively involved in the development of the organisation’s safety and quality goals, policies, procedures and protocols.

Audiology Australia’s comments regarding AHPA’s draft response to version 2 of the NSQHS Standards

Audiology Australia supports AHPA’s draft response to the NSQHS Standards version 2 dated 26 October 2015.

The only request for change that we would like to make is the possible addition of a point under the “AHPA endorses:” section on page 1 of AHPA’s draft response. We would appreciate it if you could add a point regarding point 4 above endorsing the new, more collaborative, role of clinicians in the safety and quality improvement process when compared to version 1 of the standards.

Audiology Australia looks forward to collaborating with AHPA on further submissions.

Yours sincerely,



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