



28 May 2020

Adjunct Professor Debora Picone AO
Chief Executive Officer
Australian Commission on Safety and Quality in Health Care
GPO Box 5480
Sydney NSW 2001

Via email: DMHS@safetyandquality.gov.au

Dear Professor Picone,

Consultation on the ACSQHC's draft Digital Mental Health Standards

Thank you for the opportunity to provide feedback on the Australian Commission on Safety and Quality in Health Care's draft National Safety and Quality Digital Mental Health Standards.

The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of 285,000 nurses, midwives and carers across the country.

Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals, and achieve a healthy work/life balance.

Our strong and growing membership and integrated role as both a professional and industrial organisation provide us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.

Through our work with members, we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.

Digital platforms are a growing method of mental health service delivery, with rapid uptake since the commencement of the COVID-19 pandemic, and the development of these Standards is therefore particularly timely.

Canberra Office

Unit 3, 28 Eyre Street
Kingston ACT 2604
Australia

T +61 2 6232 6533

F +61 2 6232 6610

E anmfederal@anmf.org.au

W www.anmf.org.au

Melbourne Office

Level 1, 365 Queen Street
Melbourne VIC 3000
Australia

T +61 3 9602 8500

F +61 3 9602 8567

E anmfederal@anmf.org.au

W www.anmf.org.au

ANMF Journals

Australian Nursing and
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E anmj@anmf.org.au

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Advanced Nursing (AJAN)
E ajan@anmf.org.au

ABN 41 816 898 298



Introduction - context, application and intent of the NSQDMH Standards

The draft clearly defines what constitutes a digital mental health service for the purposes of application of the Standards, and explains the media that are encompassed, while acknowledging and providing for emerging technologies.

Content gaps and articulation between and within Standards

The three Standards (Clinical and Technical Governance, Partnering with Consumers, and Model of Care) articulate closely with both existing Standards and regulatory frameworks (including the Therapeutics Goods Act, the Privacy Act, Australian Consumer Law, and the Health Practitioner Regulation National Law). We particularly note the degree of articulation with the Aged Care Quality Standards, as there have been service provision gaps in this significant area of mental health need that may be narrowed with appropriate application of digital health technologies.

Language and terminology used in the Standards

The ANMF acknowledge that the sectors covered by these Standards use different language to refer to recipients of mental health care, and find “service users” an acceptable and inclusive compromise.

Resource development to assist the introduction of the Standards

One of the purposes of the Standards is to increase the uptake and adoption of digital mental health service provision. Service providers supporting service users’ decision-making by presenting the digital options they provide, including a gap analysis, would facilitate uptake of these options.

The ANMF believes the most important tools to facilitate consistent adoption of the Standards are:

- Guidance for different types of digital mental health services
- Case studies and examples – we suggest a webinar may be a useful format for both providers and service users
- Implementation guide
- Fact sheets for service users and carers
- Fact sheets for clinicians

Further comments

Digital mental health services should be an adjunct to and extension of traditional mental health service provision. They should not exclude the option for service users to choose the provision of face-to-face assessment at any stage of their engagement with digital mental health services.

The self-assessment tool for providers, which is modelled on the Health Service Standard monitoring tool, is strong, in terms of both the implementation of the standard and of developing a gap analysis and an action plan. It illustrates that the Standards provide a non-prescriptive framework for the provision of digital mental health services.



On behalf of our members across Australia, many of whom work in the mental health, suicide prevention, and alcohol and other drugs sectors, I thank you again for this opportunity to contribute to these important and necessary standards. Consistent, accountable, confidential digital mental health services cannot be delivered without the involvement and commitment of the largest component of the mental health and alcohol and other drugs workforces, registered nurses, enrolled nurses and midwives.

Should you require further information on this matter, please contact Julianne Bryce, Senior Federal Professional Officer, ANMF Federal Office, Melbourne on 0409 221 699 or at jbryce@anmf.org.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Annie Butler'.

Annie Butler
Federal Secretary