

Australian Nursing and Midwifery Federation submission

# National Safety and Quality Primary and Community Healthcare Standards

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Australian  
Nursing &  
Midwifery  
Federation



Australian Nursing and Midwifery Federation submission

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## INTRODUCTION

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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 more than 320,000 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.

Our members practice across all primary and community health care settings including but not limited to general practice, community care, schools, maternal family and child health, sexual health, correctional services, homeless outreach, and alcohol and other drug services. The ANMF welcomes the opportunity to provide feedback to the Australian Commission on Safety and Quality in Health Care on the *National Safety and Quality Primary and Community Healthcare Standards Guide for Healthcare Services*.

We offer the following feedback in response to the consultation questions:

**1. Language: How could we improve the language and terminology used in the resource to make it more appropriate and applicable to the context of your healthcare service?**

In the interests of person-centred care, the ANMF supports the use of the term 'person' or 'people' rather than 'patient' or 'consumer' throughout the Guide. These terms can be used to refer to both a person receiving healthcare services and a person who has used or may use a healthcare service. The term patient infers a passive, 'sick' role. In all contexts, but particularly primary and community settings, a person-centred approach and language is essential. Person-centred language puts people first and respects the dignity, worth, qualities and strengths of every individual.<sup>1</sup>



The term healthcare provider is often used interchangeably with a healthcare service but rarely to describe ‘trained individuals who are involved in the provision of health care’. For clarity of responsibilities throughout the guide, language used and glossary definitions should include:

- Health practitioners who are regulated under the National Law with a scope of practice (16 professions including Nursing, Midwifery, Medical practice, Aboriginal and Torres Strait Islander Health Practice, Pharmacy, Dental practice, Physiotherapy, Psychology, Chiropractic, Paramedicine, Podiatry, Osteopathy, Occupational therapy, Optometry, Medical radiation practice, Chinese medicine practitioners);
- Health professionals who are not regulated under the National Law but hold recognised tertiary qualifications (including dietitians, social workers and speech pathologists); and
- Care workers (however titled) who are unregulated and have a role but do not have a scope of practice.

**2. Usability: How could we make the content in this resource more applicable and easier to use, to help users implement the Primary and Community Healthcare Standards? Please provide any suggestions about changes to the length, layout, and level of detail of the content.**

Adjusting the spacing (or adding page breaks) between sections may help to separate and clarify points. There is inconsistency in the titling of sections, with some referring directly to clinical governance standard numbering, and others not. Consistent formatting may enable users to examine the specific sections that are relevant to their healthcare service and needs. Overall, the layout is easy to read and understand, and the level of detail is appropriate to the documents use.

**3. Clarification: Does any of the content in this resource require further clarification or rewording? Please provide any suggestions for these changes.**

*Patient Populations and Social Determinants of Health (page 23):*

The definitions for the terms used in this section are included in a further point (1.24 – page 53). For clarity and usability, these should be noted in the first instance of their use.

**4. Gaps and duplication: Are there any gaps in the content and how should these be addressed? Is there any unnecessarily duplicated content that could be removed?**

The ANMF advocates for clear and safe people handling policies<sup>2</sup>. A safe people handling policy provides for a safer approach to manual and/or physical handling whereby the manual lifting of the person is eliminated or minimised wherever possible and so far as reasonably practicable.



The ANMF policy states that employers and designers must provide a workplace that is safe and without risks to health, including provision of safely designed premises, work environments, facilities, fixtures, fittings, equipment and systems of work that do not create, contribute to, or exacerbate handling risks. All people handling needs must be monitored and reviewed on a regular basis. The ANMF recommends the addition of a section discussing the healthcare services responsibility to support safe people handling.

The “Measurement and Quality Improvement” section on page 10 minimises the importance of quality improvement strategies. The community has a right to expect that the quality of care in Australian facilities meets the highest standards. Quality improvement requires an integrated organisational approach, and assists healthcare organisations to improve overall performance, develop strong leadership, and emphasises safety and beneficial outcomes. Quality improvement initiatives can improve uptake of evidence-based practices<sup>3</sup>. Quality improvement is necessary to ensure the efficient use of funding and effective use of services and workers. Published quality improvement measures also promote collaboration between healthcare services, which improve overall quality and safety practices. This omission may devalue the purpose of quality improvement measures.

Cultural Safety (page 37):

It is the position of the ANMF that Aboriginal and Torres Strait Islander Community Controlled Health Organisations should be funded and supported to function within and advocate for their communities. It is also our position that all health services should focus on improving accessibility and safety for Aboriginal and Torres Strait Islander peoples through the provision of culturally safe and respectful health care services<sup>4</sup>. The Guide could be further improved with addition of information to assist users with an understanding of trauma-informed care. Core trauma-informed principles centre around safety, trust, choice, collaboration, empowerment and respect for diversity. Health practitioners that provide trauma-informed care acknowledge and demonstrate understanding that trauma is a possibility in the lives of all individuals and communities.<sup>5</sup>

Section 1.23 (page 51):

Aggressive and violent behaviour directed towards health practitioners and health workers is a workplace health and safety issue, is unacceptable, and should be prevented through a risk management framework. Health practitioners and health workers have the right to work in a safe and healthy environment free from occupational violence. Employers have a legal obligation to eliminate risks associate with occupational violence and aggression as far as is reasonably practicable, and minimise remaining risks so far as is reasonably practicable. The effective



prevention of occupational violence and aggression in the health care industry is in the interests of all including employers and the wider community. Please see the ANMF Policy entitled *Prevention of occupational violence and aggression in the workplace* for more detail.<sup>6</sup>

Workforce Screening and Immunisation (page 99):

It is the position of the ANMF that health practitioners have a right to immunisation against infectious diseases *at the employer's expense*.<sup>7</sup> The Guide does not include alternative recommendations for the prevention of infectious diseases. The ANMF policy includes facilities having appropriate ventilation and air movement management systems, appropriate cleaning and sanitising of surfaces, mandated training and fit-testing in the use of masks and/or other personal protective equipment (PPE) provided for healthcare, and designing spaces to ensure appropriate movement and placement of people and equipment to minimise the risk of spread of infection.

**5. Additional Resources: Are there any additional resources that might be helpful to include under “Where to go for more information” sections?**

- *Patient Populations and Social Determinants of Health* (page 23)
  - o Include the WHO's *Handbook for Guideline Development*, Chapter 5 – Incorporating Equity, Human Rights, Gender, and Social Determinants into Guidelines. (<https://www.who.int/publications/i/item/9789241548960>).
- 1.23 (page 51)
  - o Include the ANMF Victorian Branch's *10 Point Plan to End Violence and Aggression: A Guide for Health Services*. (<https://www.anmfvic.asn.au/~media/files/anmf/ohs/ovaguide-10pp.pdf>).
- *Standard and Transmission-Based Precautions* (page 86)
  - o Include the WHO's *Infection Prevention and Control* website. (<https://www.who.int/teams/integrated-health-services/infection-prevention-control>).
- *Multidisciplinary Collaboration* (page 119)
  - o Include the Australian College of Midwives *National Midwifery Guidelines for Consultation and Referral* (4<sup>th</sup> edition) ([https://midwives.org.au/common/Uploaded%20files/\\_ADMIN-ACM/National-Midwifery-Guidelines-for-Consultation-and-Referral-4th-Edition-\(2021\).pdf](https://midwives.org.au/common/Uploaded%20files/_ADMIN-ACM/National-Midwifery-Guidelines-for-Consultation-and-Referral-4th-Edition-(2021).pdf)).



## CONCLUSION

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Thank you for this opportunity to provide feedback on the Australian Commission on Safety and Quality in Health Care's *National Safety and Quality Primary and Community Healthcare Standards Guide for Healthcare Services*. The ANMF supports the provision of high-quality, safe care, recognising the need for educated and skilled health practitioners working to their full scope of practice. This submission has identified some issues that, if addressed, could strengthen the Guide and support those receiving and delivering care.

## REFERENCES

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- <sup>1</sup> Hyams, K, Prater, N., Rohovit, J., Meyer-Kalos, P.S. (2018). Person-centered language. Clinical Tip No.8 (April, 2018): Center for Practice Transformation, University of Minnesota. Available at: <https://practicetransformation.umn.edu/practice-tools/person-centered-language/>
- <sup>2</sup> Australian Nursing and Midwifery Federation. (2018). *Safe patient handling*. ANMF Policy. Melbourne: ANMF. Available at: <https://www.anmf.org.au/resources/policies-guidelines-position-statements>
- <sup>3</sup> Hespe, Charlotte, Rychetnik, Lucie, Peiris, David, and Harris, Mark. (2018). "Informing Implementation of Quality Improvement in Australian Primary Care." *BMC Health Services Research* 18, no. 287.
- <sup>4</sup> Australian Nursing and Midwifery Federation. (2019). *Aboriginal and Torres Strait Islander Health*. ANMF Position Statement. Melbourne: ANMF. Available at: <https://www.anmf.org.au/resources/policies-guidelines-position-statements>
- <sup>5</sup> NSW Health. What is trauma-informed care? Available at: <https://www.health.nsw.gov.au/mentalhealth/psychosocial/principles/Pages/trauma-informed.aspx>  
Accessed 24 February 2023.
- <sup>6</sup> Australian Nursing and Midwifery Federation. (2021). *Prevention of occupational violence and aggression in the workplace*. ANMF Policy. Melbourne: ANMF. Available at: <https://www.anmf.org.au/resources/policies-guidelines-position-statements>
- <sup>7</sup> Australian Nursing and Midwifery Federation. (2021). *Work health and safety*. ANMF Policy. Melbourne: ANMF. Available at: <https://www.anmf.org.au/resources/policies-guidelines-position-statements>