



Submission to the Department of Health and Human Services: April 2018

HEALTH SERVICES (PRIVATE HOSPITALS AND DAY PROCEDURE CENTRES) AMENDMENT REGULATIONS 2018

The Australasian College for Emergency Medicine (ACEM) welcomes the opportunity to provide its submission to the Department of Health and Human Services (the Department) on the draft *Health Services (Private Hospitals and Day Procedure Centres) Amendment Regulations 2018* (the Regulations).

ACEM is a not-for-profit organisation responsible for the training and ongoing education of emergency physicians, and for the advancement of professional standards in emergency medicine, in Australia and New Zealand. As the peak professional organisation for emergency medicine, ACEM has a vital interest in ensuring the highest standards of emergency medical care are maintained for all patients.

ACEM broadly supports the definitions provided in the Regulations. ACEM notes that the “**Emergency Stabilisation Treatment**” definition is not relevant to emergency departments (ED) but considers the ‘**emergency medicine**’ definition accurate and of direct relevance to EDs. ACEM further considers that this definition does not supersede its own definitions and guidelines.¹

ACEM believes that healthcare systems require sound governance processes in order to minimise the risk of adverse patient outcomes. Monitoring and reporting on the quality outcomes of care provided to patients is an essential component within the ED and within the broader hospital system. It is also essential that the actions undertaken by responsible authorities uphold the overall aims of patient safety and quality care. ACEM considers that the Regulations will provide the appropriate mechanism to achieve these requirements. ACEM also considers that the inclusion of an independent clinician to each premises’ governance board must not be a token appointment, rather, it must be verified as adding value to the board and to ensuring the quality of improved patient outcomes.

ACEM agrees with the Department that “*Open and honest discussion between healthcare providers, patients and families affected by error is considered to be a central feature of high quality and safe patient care.*” ACEM supports the Australian Open Disclosure Framework (the Framework) and considers that the measures included in the Regulations are consistent with the Framework’s principles.²

¹ ACEM. P02 - Policy on Standard Terminology. Melbourne: Australasian College for Emergency Medicine; 2009. Melbourne: Australia

² Australian Commission on Safety and Quality in Health Care, 2013. *Australian Open Disclosure Framework: Better communication, a better way to care*. Section 1.3. Commonwealth of Australia

ACEM also firmly believes that patient safety must underpin all elements of our health care system, both public and private. We have undertaken significant commitments to ensure our workplace and training culture is responsive to the needs of our members and trainees.³ Reflection and engagement with patients, members and trainees is essential to provide high quality patient care that upholds the highest possible professional standards in emergency medicine.

ACEM considers that the inclusion of private hospital emergency departments into the Victorian Emergency Minimum Dataset (VEMD) process will help to plan health services, undertake clinical research and improve quality of care. This measure has the potential to establish improved access to emergency care information for primary care practitioners and to develop an understanding of the potential for system-level improvement by better use of this data at an aggregated level. ACEM considers it necessary for the Department to work in partnership with ACEM to ensure private emergency departments are supported to meet the requirements of the VEMD.

ACEM looks forward to continuing to work with the Department in the implementation of the Regulations. The Department must continue to ensure that clinical expertise is sought out and engaged with when undertaking reform to emergency departments. If you require any clarification or further information, please do not hesitate to contact the ACEM Policy Officer Lee Moskwa on (03) 9320 0444 or lee.moskwa@acem.org.au.

Yours sincerely,



Dr Simon Judkins
President



Dr Michael Ben-Meir
Chair, Private Practice Committee

³ Australasian College for Emergency Medicine, 2018. *Discrimination, Bullying and Sexual Harassment Action Plan*. Melbourne: Australia