

Submission

Parliamentary Committee on the Health Care Complaints Commission

Thank you for inviting the Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG, the College) to make a submission to the Parliamentary Committee on the Health Care Complaints Commission ('HCCC') on the HCCCs 2021-22 and 2022-23 annual reports.

Background

The Committee on the Health Care Complaints Commission ('the Committee') is a joint statutory committee of the NSW Parliament that monitors, reviews and reports on the HCCCs performance, including on its annual and other reports. The Committee's primary duty is to report on changes needed to the HCCCs functions, structures and processes, as well as to monitor and review the Health Conciliation Registry's exercise of its functions per Part 4 of the *Health Care Complaints Act 1993*.

RANZCOG is the lead standards body in women's health in Australia and New Zealand, with responsibility for postgraduate education, accreditation, recertification, and the continuing professional development of practitioners in women's health, including both specialist obstetricians and gynaecologists, and GP obstetricians. Accordingly, RANZCOG would like to provide the following feedback for consideration by the Committee as they undertake their annual review of the HCCC.

Specific Feedback

Feedback was sought in response to specific prompts, which are encapsulated below:-

Benchmarks and Performance Measures

- Pursuant to section 22(a) *Health Care Complaints Act 1993*, 60 days is an appropriate timeframe for assessing complaints, provided that the complaint is assessed by an appropriate delegate(s), with sufficient expertise to handle the complaint.
- 60 days is similarly a reasonable and appropriate timeframe for completing the review of assessment decisions.
- 12 months is an appropriate timeframe for the HCCC to complete investigations, in instances where they pertain to potentially significant issues of public health or safety; significant departures from clinical treatment and professional conduct standards; and/or where there may be grounds for disciplinary action.
- With respect to the abovementioned timeframes, all complaints and/or investigations should be completed as soon as practicable to allow all parties to move forward.
- The statutory indicators, non-statutory indicators and indicators without targets included in the 2020-21 annual report are descriptive and appropriate.

Stakeholder Engagement

- The HCCC is to be commended for its First Nations Engagement and Connection Strategies, which expanded from the HCCC's 2021-22 annual report to the 2022-23 annual report, including:

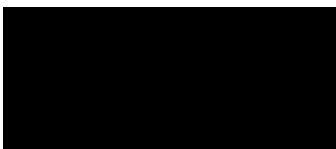
- Cultural safety training for new staff, strategic partnerships with First Nations stakeholders including the Aboriginal Women's Consultation Network and streamlined triage processes focused on identification and culturally appropriate management of complaints made by First Nations persons -- all of which are extremely positive.
- Further data is required to demonstrate that these initiatives are meeting their stated objectives, namely: increased participation and greater access for First Nations persons seeking to make a complaint.
- The HCCC is to be commended for raising awareness of the organisation, and its services to build relationships among culturally and linguistically diverse ('CALD') communities and people from refugee and refugee-like backgrounds. Notwithstanding that further and enduring efforts are required to enhance strong community awareness of the role and functions of the HCCC.
- Strategies for improving the HCCCs participation with, and provision of services to, First Nations and CALD communities might include greater engagement with Aboriginal Community Controlled Organisations ('ACCOs'); particularly with community leaders and healthcare providers working within these communities. The introduction of Indigenous Liaison Officers and social workers in these communities may also be beneficial.

Summary

RANZCOG supports the Committee's review of the HCCCs performance and public engagement objectives. The College notes that while the use of key indicators was discontinued in the 2021-22 and 2022-23 annual reports, the statutory indicators, non-statutory indicators and indicators without targets are extremely beneficial for the lay-person, and professional alike, to gain a snapshot of overall performance. It may be useful to include First Nations and CALD data in these indicators to demonstrate the efficacy of engagement and connection strategies.

RANZCOG acknowledges with thanks, the contribution of Dr Sophie Doherty for this submission.

Yours sincerely,



Dr Gillian Gibson
President

References

1. Health Care Complaints Commission – Annual Report 2021-22
2. Health Care Complaints Commission – Annual Report 2022 – 23