



Northern Territory Government
Department of Health and Community Services

Northern Territory Government Pathology Service
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Standards and Accreditation Study
Productivity Commission
PO Box 80
BELCONNEN ACT 2617

Dear Sir/Madam,

RE: Standards and Accreditation Submission to the Productivity Commission

Qualifications and Experience

1. I am a registered medical practitioner¹ (Northern Territory) and a Specialist Pathologist². I have been practising as a Specialist Pathologist in Microbiology in the Northern Territory since February 1996.

Declaration of Interest

2. I am the elected member representative on National Association of Testing Authorities, Australia (NATA) Council for the Northern Territory.
3. I am a board member Proficiency Testing Australia (PTA).
4. I am Vice President of the Royal College of Pathologists of Australasia (RCPA).
5. I am a Medical Testing assessor in the NATA/RCPA accreditation program.

Background

6. My main experience with the NATA is through the Medical Testing accreditation program conducted jointly between NATA and RCPA according to National Pathology Accreditation Advisory Council (NPAAC) standards.
7. I have read the *Issues Paper* for the Standards and Accreditation commissioned study.

Accreditation versus Regulation – My View

8. My comments reflect mostly the Medical Testing program under the auspices of NATA/RCPA.
9. For the last 25 years pathology services in Australia have undergone a revolutionary change in quality practice through the NATA/RCPA Medical Testing accreditation process. This program has elevated Australian pathology services to be widely regarded as the world leader. The best examples of this are the turnaround time statistics for various result reports from pathologists to referring medical practitioners. This is coupled with a very successful quality assurance process.

¹ University of Queensland 1989.

² Royal College of Pathologists of Australasia 1995.

10. The Medical Testing accreditation process is one of peer review involving pathologists and medical laboratory scientists visiting and assessing pathology services. It is not regulation in the sense of inspection and sanction (although sanctions are available).
11. Pathologists and medical laboratory scientists in Australia are an active part of this process and recognise the benefits in terms of patient care.
12. NATA assists the Australian Healthcare System by avoidance of system failures and early detection of systems in need of assistance through its agreements with medical organisations such as the RCPA and Royal Australian and New Zealand College of Radiologists (RANZCR).
13. The peer review process facilitates accreditation rather than an inspection/regulation process which would be costly and potentially create an atmosphere of hostility and antagonism.
14. Accreditation in healthcare facilitates best clinical practise and sharing of technical knowledge.
15. Having a single authority for accreditation provides economy and by involving other organisations reduces potential claims of anti-competitive behaviour. Moreover, NATA is not-for-profit and the assessments are based on a large volunteer assessor base.
16. The introduction of multiple accrediting bodies would dilute the enormous benefit currently accrued to NATA. Furthermore, in the medical profession, allowing accreditation in Medical Testing by another organisation runs a significant risk to patient safety if the other organisation do not also include the RCPA in their processes. The current workforce in pathology is such that diluting accreditation may pose a risk to successful accreditation of pathology services.
17. NATA is an association of members and while government supported it has a good balance in terms of governance.

NATA Generally

18. I would support the ongoing role for NATA as Australia's main accreditation body because of its long history as an effective and efficient organisation.
19. NATA has proven itself as a reliable and respected organisation in the fields of accreditation of pathology services³, other laboratory services, inspection organisations, proficiency testing/quality assurance providers and reference materials producers.

Pathology Standards

20. For pathologists and medical laboratory scientists, our practice is governed by formal standards.
21. The overall standard is ISO 15189 (this has been rebadged by Standards Australia as AS 4633 *Medical laboratories – Particular requirements for quality and competence*).
22. Specific standards for the practise of pathology in Australia are determined by NPAAC.
23. It is not appropriate to subsume the role of NPAAC into Standards Australia. Both organisations are very different and function in different modes.
24. NPAAC has a rapid review process for all its documents and sets an agenda that ensure timely review and assessment of new information. Council is made up of nominees and representatives of professional bodies and jurisdictional governments. Documents are developed by recognised experts in their field and link directly to Council.
25. NPAAC documents are all provided free of charge and despite copyright are to be used widely in pathology service practice.

³ Along with RCPA.

26. Experience with Standards Australia is that is a significantly larger organisation. Its documents are reviewed less frequently.
27. Standards Australia documents are available at considerable cost.
28. Standards Australia has a significant role in developing and providing documents for various industries and professions. As an organisation it should be maintained, but its processes should be examined with a view to making it more responsive to the needs of its clients and making its documents available free of charge.
29. I believe there may be a conflict within the organisation between the need for observing copyright and making standards documents user friendly documents for the improved quality of output from users. Access to documents can be difficult and the expense makes them less accessible to many potential users. If standards are meant to optimise safety this is perverse result of cost recovery.
30. I strongly recommend Standards Australia documents should become free-of-charge so ensure widespread use amongst the Australian community.

Final Comments

31. Both NATA and Standards Australia need to be preserved and supported by all governments at the national and territory/state level.
32. Importantly NPAAC must be maintained as the main standard setting body for the pathology profession.
33. Medical Testing accreditation by NATA/RCPA should be maintained as the method for accreditation of pathology services in Australia.

Yours sincerely

[Submitted electronically]

Gary Lum, AM
Director, NTGPS

Monday, 17 April 2006