

AUSTRALIAN COMMISSION ON SAFETY AND QUALITY IN HEALTH CARE

TRIM: D21-28634

Sian Lewis
Executive Officer
Optometry Council of Australia and New Zealand
GPO Box 9958
MELBOURNE VIC 3001

Dear Ms Lewis

Consultation on Optometry Council of Australia and New Zealand (OCANZ) Accreditation Standards and Evidence Guide for Entry-Level Optometry Programs

Thank you for your email of 22 June 2021 seeking feedback from the Australian Commission on Safety and Quality in Health Care (the Commission) on the *Review of OCANZ Accreditation Standards and Evidence Guide for Entry-Level Optometry Programs Discussion Paper June 2021*.

I note that your discussion document states that the overall goal of the project includes recommending such revisions as necessary to take account of best practice and relevant recent regulatory changes in the education and health sectors such as the National Safety and Quality Health Service (NSQHS) Standards.

The Commission encourages all agencies concerned with health professional education accreditation standards to make explicit reference to the range of national safety and quality standards developed by the Commission. This could be explicitly referenced within the OCANZ Public Safety Standard Statement 1 (and be an additional inclusion in the pieces of core evidence outlined in the Standards).

The Commission's national safety and quality standards go beyond the [NSQHS Standards](#), which are the nationally agreed mandatory standards that specify the safety and quality of care expected of health service organisations. Other standards that the Commission produces that are relevant to the OCANZ Accreditation Standards, and to the educational outcomes expected of optometry graduates, include the soon to be published *National Safety and Quality Primary and Community Healthcare Standards*, which are person-centred and describe key aspects of health care related to quality and safety. While these sets of documents specify the standards for health services and primary and community health care organisations, the capacity of organisations to meet them depends on the knowledge, skills and behaviours of clinicians working within these organisations. There is content within these Standards, for example relating to collaborative practice, team based care and comprehensive care that applies across all health professions. Specific actions to support the provision of culturally safe care are included in these Standards.

The Commission also produces Clinical Care Standards which contain a small number of quality statements that describe the care patients should be offered by health professionals and health services for a specific clinical condition or defined clinical pathway in line with current best evidence. For example the [Cataract Clinical Care Standard](#) relates to the care of patients 18 years and over with cataract. It covers the assessment of patients with suspected cataract, cataract surgery where appropriate and postoperative care to complete visual rehabilitation. This clinical care standard will apply to all healthcare settings where care is provided to patients

with cataract including primary care, Aboriginal and Torres Strait Islander Health Services, hospitals and privately-operated eye clinics.

Additionally, OCANZ could include the [Australian Charter of Healthcare Rights](#) which are rights that apply to all people in all places where health care is provided in Australia. It is important that all healthcare workers apply the principles set out in the Charter in the course of their work.

The Commission also supports the addition of a new domain to the OCANZ standards to recognise health care for First Nations Peoples (Australia and New Zealand), cultural safety and related matters.

If you require further advice regarding this response please contact me through mail@safetyandquality.gov.au.

Thank you for the opportunity to comment on this important work.

Yours sincerely

A handwritten signature in black ink that reads "Anne Duggan". The signature is written in a cursive style with a large, stylized 'A' and 'D'.

Conjoint Professor Anne Duggan
Chief Medical Officer

30 July 2021