## **RACMA** Comment



## ACSQHC: Draft Sustainable Healthcare Module

Action	Intent	Suggested strategies	RACMA Comment
<ol> <li>The governing body:</li> <li>a) Provides leadership to maximise opportunities for sustainable healthcare within the health service organisation</li> <li>b) Sets organisational priorities to improve sustainability outcomes</li> <li>c) Considers sustainability outcomes when it partners with consumers in planning, designing, and evaluating healthcare.</li> </ol>	The governing body leads the organisation's response to climate risk by setting priorities, ensuring implementation, and reviewing organisational performance.	<ul> <li>The governing body:</li> <li>Includes sustainability priorities and objectives in strategic plans and other organisational policies or governance structures</li> <li>Sets evidence-based sustainability targets and priorities for the organisation</li> <li>Ensures that the sustainability strategy aligns with the organisation's governance structures</li> <li>Includes sustainable healthcare priorities and climate-resilience within the organisation's strategic plans</li> <li>Ensures partnerships with consumers and other key stakeholders to inform, develop, implement, monitor and evaluate the organisation's sustainability performance</li> <li>Ensures the material risks to health services and infrastructure from climate events are identified and mitigated</li> <li>Monitors the organisation's response to sustainability targets</li> <li>Ensures that reviews of clinical variation include consideration of sustainability outcomes.</li> </ul>	<ul> <li>This action and its intent recognise that the governing body is responsible for developing the organisational strategy to address the effects of climate change and sustainability. Some organisational priorities (e.g. buildings and procurement) are out of scope for Clinical Governance.</li> <li>Even though this has an organisational focus it could be included in the Standard 1 of the existing ACQHC Standards, Clinical Governance.</li> <li>The following statement in the suggested strategies is narrow: "Ensures that reviews of clinical variation include consideration of sustainability outcomes."</li> <li>It is suggested that a broader strategy of reducing waste is added and reducing clinical variation is given as an example.</li> </ul>



<ul> <li>2. The health service organisation uses its established clinical governance systems to implement evidence- based strategies to:</li> <li>a) Achieve organisational priorities for sustainability</li> <li>b) Plan for and build climate- resilience, and maximise sustainable healthcare initiatives to improve health services and infrastructure across the organisation</li> <li>C) Adapt clinical practices to reduce and mitigate the health service's contribution to emissions.</li> </ul>	The health service organisation integrates its strategies to improve sustainability outcomes and monitor performance into its everyday business by using its clinical governance systems.	<ul> <li>The health service organisation:</li> <li>Identifies, prioritises and is aligned to climate risk targets set by the board using local data</li> <li>Establishes baseline measurements for priority areas, such as the organisation's carbon footprint and carbon hotspots</li> <li>Identifies committees, positions, clinical groups or leadership positions, that could facilitate measurement and reporting on performance against sustainable healthcare priorities</li> <li>Adopts best practice guidelines for the management of sustainability</li> <li>Implements changes to clinical practice which reduces duplication or low-value investigations and treatments</li> <li>Plans for and incorporates climate risk mitigation, adaptation, and resilience strategies into existing risk management and business continuity plans.</li> </ul>	It is questioned whether all elements in the 3 proposed actions sit with clinical governance and specifying clarifying what is the responsibility of clinical governance is suggested. Action 2a) "Achieve organisational priorities for sustainability" is a whole of organisation approach and would include actions that are not in scope for clinical governance. Action 2b) refers to infrastructure which is partially in scope for clinical governance with activities such as consideration of improving the environment for patient care and mitigating transmission of infection. through the air conditioning. Actions 2b) and 2 c): planning and implementing healthcare initiatives and changing clinical practices are generally the responsibility of clinical service development and design teams and align with clinical governance as improving the safety and quality of patient care and patient experience are considered when undertaking these activities. The Intent "The health service organisation integrates its strategies to improve sustainability outcomes and monitor performance into its everyday business by using its clinical governance systems" indicates a whole of organisation approach. It is questioned whether clinical governance is monitored and reported on by corporate governance is monitored and reported on by corporate governance with measures related to clinical governance components part of the organisation wide report. The only strategy that is solely within the remit of clinical governance is "Implements changes to clinical practice which reduces duplication or low-value investigations and treatments."
			investigations and treatments." The other strategies encompass a whole of organisation focus.



<ul> <li>3. The health service organisation:</li> <li>a) Develops or adopts measures and indicators to monitor sustainability</li> <li>b) Integrates sustainability measures and indicators into routine clinical governance monitoring and reporting</li> <li>c) Uses information from monitoring its sustainability initiatives to improve the safety, appropriateness and quality of clinical practices.</li> </ul>	The health service organisation collects and analyses information on its climate risk and uses this information to improve in priority areas.	<ul> <li>The health service organisation:</li> <li>Agrees on measures and key performance indicators for sustainability</li> <li>Develops and endorses a sustainable healthcare strategy and reporting framework</li> <li>Includes sustainability as a standing agenda item reporting at relevant governance committees</li> <li>Reports publicly on sustainability performance and action taken to reduce climate risk</li> <li>Reports publicly on the reduction of duplicated or low-value investigations and treatments</li> <li>Monitors and reports on changes in sustainability outcomes over time.</li> </ul>	<ul> <li>The issue noted for the actions in section 2 about clarifying the responsibilities of corporate and clinical governance also applies to this section.</li> <li>If the actions solely relate to sustainability measures for health care and services and, patient experience the text needs to reflect this.</li> <li>For instance it is suggested that action 3a) "Develops or adopts measures and indicators to monitor sustainability" could be modified to reflect that the measures and indicators relate to health care, services and outcomes and patient experience.</li> <li>Also, the Intent "The health service organisation collects and analyses information on its climate risk and uses this information to improve in priority areas" would specify information related to health care, services and outcomes and patient experience.</li> <li>Similarly, the following proposed strategies would need to specify that they pertain to domains applicable to monitoring by clinical governance:</li> <li>Agrees on measures and key performance indicators for sustainability</li> <li>Develops and endorses a sustainable healthcare strategy and reporting framework</li> <li>Includes sustainability as a standing agenda item reporting at relevant governance committees</li> <li>Reports publicly on sustainability performance and action taken to reduce climate risk</li> <li>Monitors and reports on changes in sustainability outcomes over time.</li> </ul>
--	---	---	---



4. The health service organisation uses its training system to improve sustainable healthcare and the climate risk literacy of its workforce.	The workforce is supported to develop the skills and knowledge to understand, measure, monitor and improve sustainability in the organisation and is supported by the organisation.	<ul> <li>The health service organisation:</li> <li>Provides the workforce with access to training on sustainability and the effect on their local community and how to respond to climate events, including relevant disaster management frameworks</li> <li>Demonstrates how it supports workforce participation in training on sustainable health care</li> <li>Collects feedback from the workforce on training that is used to improve sustainability outcomes.</li> </ul>	This education would encompass a mix of clinical and corporate activities. The health services' responsibility to inform their workforce about effects on their local community is queried and education provided by other agencies needs to be considered.
<ul> <li>5. The health service organisation supports:</li> <li>a) Its workforce and consumers to participate in the development and implementation of sustainability strategies</li> <li>b) Reports to the governing body, the workforce and consumers on sustainability strategies.</li> </ul>	The governing body, management, workforce and consumers are engaged in identifying, designing and delivering sustainability strategies that maximise opportunities to implement sustainable healthcare initiatives across the service.	<ul> <li>The health service organisation, in collaboration with its workforce and consumers, amends its policies and processes to:</li> <li>Select consumables that are ecologically friendly for use in clinical care</li> <li>Facilitate workforce innovation, local quality improvement and projects to improve sustainability, including unwarranted clinical variation</li> <li>Design and deliver improvements or projects with consumer participation to improve sustainability</li> <li>Publish sustainability reports tailored to the health literacy of the workforce and consumers</li> <li>Provide patients with information about sustainable health care and any impact on their clinical care.</li> </ul>	Some suggested strategies for this action are a corporate function (e.g. Select consumables that are ecologically friendly for use in clinical care) and some could be clinical and corporate (e.g. Design and deliver improvements or projects with consumer participation to improve sustainability).