

21 September 2023

Legislative and Regulatory Reform Team
Regulatory Reform Branch
Regulatory, Risk, Integrity and Legal Division
Department of Health

Via email: legandregreform@health.vic.gov.au

Dear Legislation and Health Regulation Reform Team

Re: Review of Health Services (Health Service Establishments) Regulations 2013 - discussion paper for consultation

Thank you for the opportunity for RACGP Victoria to provide feedback on the [Review of Health Services Regulations 2013 discussion paper consultation](#). The information below constitutes the RACGP's feedback on the discussion paper.

- RACGP Victoria would like to request that the definitions (page 13, table 1) state that the health services do not include general practice, for which bespoke standards exist and are defined by the RACGP, further described in the next point.
- The RACGP sets the *Standards for general practices*, a benchmark for quality care and risk management in Australian general practices. The Standards support general practices in identifying and addressing potential deficiencies in their systems and processes and provide a framework for review and continuous quality improvement. Patients and practice teams experiences and outcomes are central to the Standards which continue to evolve as a synthesis of the most contemporary evidence-based practice. The Standards incorporate consideration of the expectations of consumers and other relevant stakeholders and are developed after an extensive public consultation process and are subject to rigorous and continuous evaluation.
- The RACGP supports efforts to improve patient safety, avoid duplication, and improve communication and collaboration between providers within the primary care and acute sectors. We support the concept of a quality framework that promotes consistency in quality and safety but note that there is necessary variation between healthcare settings due to practice models, clinical focus, patient cohorts, and services provided. The RACGP already sets general practice specific Standards. These regulations are not tailored to, nor suitable for, general practices and should not be applied to general practices. We note that given the health service definitions and scope within the regulations, it is not their intention to apply to general practices but want to stress that subsequent or inadvertent application to general practices is inappropriate. Multiple accreditation processes are a time and cost burden for practices.



- The definition of a general practice for the purpose of accreditation identifies services that are eligible for accreditation against the Standards. This definition of a general practice for the purpose of accreditation is for the assessment of the environment and systems of quality and safety – the administrative, organisational and business practices, as specified within the Standards, that allow GPs to provide medical care in their community. A practice, once acknowledged as meeting the definition of a general practice for the purpose of accreditation, can then go on to be assessed against all mandatory indicators in our Standards.
 - To meet the definition, a practice must:
 - provide comprehensive, patient-centred, whole-person and continuous care; and
 - provide services that are predominantly of a general practice nature (more than 50% of the practice's general practitioners' clinical time (ie collectively), and more than 50% of services for which Medicare benefits are claimed or could be claimed (from that practice) are in general practice.)
 - As such, practices can incorporate GPs with specific interests, such as skin services, but need to be providing predominantly comprehensive and whole-person care to be considered a general practice for accreditation. Meanwhile, a service that provides solely skin services and therefore is not providing predominantly comprehensive is not considered a general practice by the RACGP and is not eligible for accreditation.

If you have any queries or would like to meet to discuss further, please contact Kon Kakris, RACGP Victoria State Manager on 03 8699 0979 or at Kon.Kakris@racgp.org.au

Yours sincerely,

Dr Anita Muñoz
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