

3 April 2023

Australian Commission on Safety and Quality in Health Care
Level 5, 255 Elizabeth Street
Sydney
NSW 2000

Via email: mail@safetyandquality.gov.au

Dear ACSQHC secretariat,

Re: Framework for Australian clinical quality registries, Second Edition

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide comments on the Framework for Australian clinical quality registries (CQRs), Second Edition (the Framework). The RACGP generally agrees with the aims and priorities for the Australian national CQRs.

Specific comments on the framework are outlined below.

1. National arrangements for CQRs (p2)

- It needs to be made clear who this guidance is aimed at, and if this includes privately owned healthcare providers.
- The RACGP recommends all public benchmarking should be avoided. Public benchmarking of performance of individual clinicians and of clinical systems can have unintended consequences such as reduced access to treatment for high-risk patients, reduction in patient-choice about their care, and reluctance of services to openly share data. Collected data needs to be carefully chosen and analysed to reduce the risk of these unintended consequences. Capacity building and appropriate resourcing to investment in improvement needs to be considered if public benchmarking occurs.

2. National CQRs operating within a quality improvement framework (p6)

- The Framework and any associated policy should aim to build capacity for data analysis/interpretation and continuous quality improvement by clinicians. These activities are currently not funded for private practitioners.
- The RACGP's [Secondary use of general practice data principles](#) provides decision-making support to assist GPs and practice staff to decide whether it is appropriate to release deidentified healthcare data at the request of an external organisation. This is a useful resource to help implement the Framework and meet the reporting requirements set for the CQRs.

3. Aims (p7)

Aim 5: We emphasise that provider specific outcomes that are being benchmarked should only be used for continuous quality improvement and should not be taken out of context, in particular for political purposes.



4. Prioritisation criteria (p8)

Point 2.12: Sufficient resources need to be available for continuous quality improvement so that positive changes can be made and subsequently longitudinally evaluated using information in CQRs. The cost impact on private primary providers, such as allied health, residential aged care providers and skin cancer clinics, who do not receive funding through the Practice Incentives Program (PIP) needs to be taken into consideration.

5. Strategic and Operating Principles for national CQRs (p11)

1.2 Operating principles

The RACGP notes that researchers are missing from Figure 3, model 2 on page 13 of the framework and recommend this inclusion. A hospital-only focus in Figure 4, model 2 on page 14 of the framework is inappropriate given that most of the country's health is delivered outside hospitals. We recommend modification of the figure to indicate this.

1.2.2 Data collection

Point 7: Note that transparent collection and use of data will enhance trust from providers as well as the public.

6. Other comments

- Researchers are a key stakeholder group as research teams are uniquely placed to evaluate the impact of CQRs and to develop improved indicators. To support innovation, health researchers/research teams need access to CQRs.
- Much of the detail in the Framework focusses on hospital management and is poorly applicable in other settings such as allied health, pharmacy, general practice and specialist outpatients. We also note the Advisory Group did not have representatives from primary care. We request clarification on the applicability of the Framework to the primary care sector, where the majority of Australian healthcare is provided.

Thank you again for the opportunity to provide feedback on the Framework for Australian clinical quality registries (CQRs), Second Edition. For any enquiries regarding this letter, please contact Stephan Groombridge, National Manager, Practice management, Standards and Quality Care on 03 8699 0544 or stephan.groombridge@racgp.org.au.

Yours sincerely

Dr Nicole Higgins
President