

30 October 2019

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Feedback on the draft guidelines for registered practitioners and students in relation to blood-borne viruses.

I am pleased to provide feedback on the draft guidelines for registered practitioners and students in relation to blood-borne viruses (**draft guidelines**).

By way of background, the HCC was established under the *Health Complaints Act 2016 (Act)* to provide for a complaints process and other processes about health service provision and related matters in Victoria. The Act enables the HCC to protect Victorians from dangerous or unethical health service providers, with powers to investigate and take action where appropriate.

Our role is to support and assist with the resolution of complaints and to subsequently contribute to improvements in the quality of health care delivery. We work impartially with both health service providers and consumers (or their representatives) to resolve complaints using alternative dispute resolution approaches to promote agreement and goodwill. Where a matter is not suitable for a complaint resolution process, or complaints raise significant issues of public health and safety related to systemic issues or general health service providers, it may require investigation, which in turn may lead to outcomes such as warning statements, prohibition orders or undertakings.

As an organisation that has a key role in regulating general health service providers (i.e. non-registered health service providers), the HCC has a keen interest in any tools that support practitioners to comply with guidelines relating to infectious diseases generally. Under the General code of conduct in respect of general health service providers (**Code**) in Schedule 2 of the Act, two clauses specifically deal with the adoption of standard precautions for infection control and general health service providers diagnosed with infectious diseases. It is noted that the draft guidelines are aimed at practitioners and students who perform exposure-prone procedures or are living with a blood-borne virus and are complementary to the Communicable

Diseases Network Australia *Australian national guidelines for the management of healthcare workers living with blood borne viruses and healthcare workers who perform exposure prone procedures at risk of exposure to blood borne viruses 2018 (CDNA guidelines)*. The draft guidelines support the Code requirements by reinforcing the need for all health care workers to practice in a way that does not pose a risk to the public and to seek where required treatment from a registered health practitioner.

The specific questions set out in the public consultation paper dated 5 September 2019 are best addressed by the relevant Boards and practitioners and students who may be affected by the draft guidelines. However, overall, the content is set out clearly and succinctly covers the relevant areas.

The draft guidelines provide clear and easy to understand guidance to practitioners and students which was its aim and purpose. Any additional guidance that reinforces the need to comply with the CDNA guidelines, to practice in a safe and ethical manner and reduce the risk to the public is to be supported and a welcome addition.

Thank you for the opportunity to provide feedback on the draft guidelines. I would be pleased to discuss any aspect of the above.

Yours sincerely



Karen Cusack
Health Complaints Commissioner