



Consumers Health  
Forum OF Australia

SUBMISSION

# Establishing and Sustaining Regional, Rural and Remote Radiation Therapy Centres

January 2020

Consumers Health Forum of Australia (2020)  
*Submission to the RANZCR Consultation Paper:  
Establishing and sustaining regional, rural and  
remote radiation therapy centres.*  
Canberra, Australia

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*Consumers Health Forum of Australia is funded  
by the Australian Government as the peak  
healthcare consumer organisation under the  
Health Peak and Advisory Bodies Programme*

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# Introduction

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Consumers Health Forum of Australia (CHF) is the national peak body representing the interests of Australian healthcare consumers and those with an interest in health care consumer affairs. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems. CHF appreciates the opportunity to provide feedback to the consultation paper on *establishing and sustaining regional, rural and remote radiation therapy centres*, developed by the Royal Australian and New Zealand College of Radiologists (RANZCR).

Overall, CHF supports the comprehensive guide for establishing and sustaining regional, rural and remote radiation therapy centres. However, we do have some key concerns including:

- Intended audience
- Consumer involvement, and
- recommendation 5.2 (a).

## Key Considerations

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### *Intended Audience*

The omission of consumer groups as the intended audience of this paper (p.3). Consumers are critical partners in planning and sustaining radiation therapy centres – no matter where they are located. We strongly recommend consumer groups be included as a third intended audience of this paper. We also note that allied health is vertically integrated into planning of the therapy centres and see value in extending the intended audience to include PHN representatives.

### *Consumer Involvement*

CHF acknowledges the consultation paper mentions the need for centres to establish consumer advisory groups to meet the “minimum standards for the provision of safe and quality radiation therapy services” (p.9) and to “to provide periodic review and feedback on centre operations, patient experience and ways to improve the centre in line with momentum and credentialing standards” (p.12). However we are disappointed to see that is the extent to which consumers are mentioned throughout the consultation paper. We fear this will promote and/or encourage a tokenistic approach to consumer involvement simply to achieve accreditation. Compared to other sections of the consultation paper that includes examples of best practice and references, the section on consumers (p. 12) is extremely limited. We recommend including additional information to emphasise the role of the consumer advisory committee and examples such as those established by Primary Health Networks and include references to the Australian Commission on Safety and Quality in Health Care’s Partnering with Consumers Standard.

### *Recommendation 5.2 (a)*

Recommendation 5.2 (a) on page 24 states “engaging a consumer group to provide tangible feedback before and after a radiation therapy centre’s establishment will be crucial to good engagement from the community as the centre develops”. CHF seeks clarification on what the above is recommending? This appears to be a statement rather than a call to action. As it currently reads, CHF fears the importance of engagement with consumer groups will be overlooked. We strongly recommend re-wording this recommendation to call for action. For example, “engage with at least one consumer group to provide tangible feedback before and after a radiation therapy centre’s establishment. This will be crucial to good engagement from the community as the centre develops.”