

ACCESS NURSES AGENCY

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Upper Pakenham 3810
Ph: 1300 550 192

Tim Grimwade
The General Manager
Adjudication Branch
Australian Competition & Consumer Commission
PO Box 1199
DICKSON ACT 2602

19 December 2001

Dear Mr Grimwade,

FILE NO.
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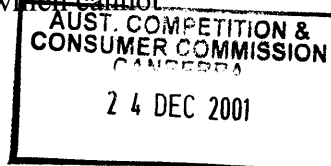
RE: APPLICATION FOR INTERIM AUTHORISATION FOR HEALTH PURCHASING VICTORIA FOR A90811 & A90812

On behalf of Access Nurses Agency I am writing to express my opposition to the granting of interim authorisation sought by Health Purchasing Victoria ('HPV') to begin the tendering process for the provision of casual staff to the public health system. The tendering process should not be started until all parties concerned have the opportunity to express how this proposal will effect them.

The reason given by HPV for the urgency of the application is purely economic. The ramifications of this proposal are far reaching and will fundamentally alter the existing nursing agency market if interim authorisation is granted. Not only will nursing agencies suffer, so will the hospitals. When nurses become aware of this proposal, morale (which is low anyway) will drop further resulting in more nurses leaving the profession. They are currently undervalued in their permanent positions and use agency to 'top up' their wages. If this extra income avenue is perceived to be no longer available, nurses will lose more faith with the health care system and leave in greater numbers. This will exacerbate the real problem which is not the price of an agency nurse but a critical shortage of nursing professionals.

HPV are the party seeking authorisation to breach the Trade Practices Act and should therefore bear the burden of proving that the granting of interim authorisation will not adversely effect the existing market. The reason for the urgency is purely economic and, given the effect this proposal will have, deficient.

This reaction by HPV to the cost of agency nurses does not address the underlying problems that dominate the health care system. It is an economic solution which cannot



work as it does not address the real reasons nurses are leaving the profession. Before any authorisation is granted for such draconian measures, all options and reasons should be evaluated.

For these reasons we ask that the Australian Competition & Consumer Commission deny HPV's application for interim authorisation to proceed with the tendering process.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K. Snowden'.

Kate Snowden
Access Nurses Agency