



VICTORIAN NURSE SPECIALISTS

The General Manager
Adjudication Branch
Australian Competition and Consumer Commission
P.O. Box 1199
Dickson
ACT 2602

Dear Mr. Grimwade,

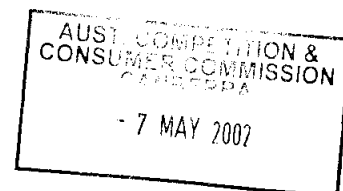
Please find enclosed a copy of the submission regarding matter **Application for Authorization Nos A90811 and A90812 lodged by Health Purchasing Victoria**

If you have any concerns regarding this submission, please feel free to contact me on (03) 9898 0000.

Your Sincerely

A handwritten signature in black ink, appearing to read 'Lina Cornell'.

Lina Cornell
Managing Director.



Application for Authorization Nos A90811 and A90812 lodged by Health Purchasing Victoria

Victorian Nurses Specialists are formally writing to comment on Health Purchasing Victoria's (HPV) amended proposed tender. Victorian Nurses Specialists are unable to determine any public benefits that may arise when the Department of Human Services (DHS) are already enforcing identical conditions of the tender.

HPV have now amended their original proposed tender to meet the conditions set out by the DHS. If HPV's amended tender is approved, then there will be no public benefits gained. Currently all nursing agencies can supply nurses to public hospitals providing the nursing agencies meet the conditions set out by the DHS. Clauses 3.3 of Part B of the tender conditions and clauses 6.2, 10.2 and 10.3 of the services agreement dictate identical conditions and pricing structures to that of the DHS. Presently, a majority of nursing agencies in Victoria are complying with the directive by the DHS and have altered their pricing structure accordingly. Therefore, public hospitals can now choose from which agency they decide to acquire nurses from. Under the proposed amended tender, hospitals will not be able to choose which agencies they acquire their nurses from. As the DHS is enforcing an identical pricing structure to what HPV are proposing, there is little reason to continue with a tender.

There is no public benefit in limiting the amount of nursing agencies that are able to supply staff. If the tender is successful then anti competitive behaviors will be evident as agencies selected to supply staff will be able to monopolize the casual nursing labor force, which has been evident in past tender attempts.