Nursing Agencies
Association of Australia

FACSIMILE TRANSMITTAL SHEET

To:	Mr. Tim Grimwade	**From:**	Bob Lorschy
Company:	Australian Competition & Consumer Comm	**Date:**	9/05/02
Fax:	02 6243 1211	**Pages:**	Five
Phone:	02 6243 1107		
Re:	Amended Application by HPV		

++ Urgent ☐ For Review ☐ Please Comment ☐ Please Reply ☐ Please Recycle

Dear Mr. Grimwade,

Please find following the submission in relation to the amended application lodged by Health Purchasing Victoria. A copy has also been mailed.

Yours sincerely,

R. Lorschy
Secretary

Nursing Agencies
Association of Australia

PO Box 84
Kogarah NSW 2217

9 May 2002

Mr. Tim Grimwade
General Manager
Adjudication Branch
Australian Competition
& Consumer Commission
Northbourne Avenue
Dickson ACT 2602

Dear Sir,

Re: **Application for Authorisation Nos A90811 & A90812
lodged by Health Purchasing Victoria**

Please find enclosed the submission from the Nursing Agencies Association of
Australia relating to supplementary application. Thank you for the opportunity to have
input.

Yours sincerely,

R. Lorschy
Secretary

A further submission to the Australian Competition and Consumer Commission in response to Amended Application for Authorisation Nos. A908111 & A90812 lodged by Health Purchasing Victoria.

Submission lodged by: **Nursing Agencies Association of Australia**

Contact Details: **Bob Lorschy**

Secretary

PO Box 84 Kogarah NSW 2217

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Nursing Agencies Association of Australia ("NAAA") files this submission in response to correspondence received from the Australian Competition and Consumer Commission ("ACCC") dated 22 April 2002 advising of amendment by Health Purchasing Victoria ("HPV") of its application for authorisation.

NAAA wishes to repeat and re-enforce the submissions made by it earlier. The alteration to the proposed tender arrangements reflected in the amended application for authorisation does not alter the position of NAAA in relation to this matter. The alteration to the proposed tender document does not address the problems associated with the world wide shortage of nurses and the issues related to keeping well qualified nurses in the hospital system.

The amendments to the tender document and the direction from the Secretary of the Department of Human Resources assume a number of things about the current staffing levels of public hospitals in Victoria. They assume:

- That the clinical load at a given hospital will be able to be determined in advance and staff rostered on to cover that load. Sudden alterations in load cannot be dealt with by agency nurses;

- That the correct patient/staff ratio has already been achieved in the hospitals and that hospitals have sufficient staff employed to cover all proper duties. This is not the case and in fact the usage of agency nurses has increased recently;

- That agency nursing staff will accept replacement grade income from public hospitals when they can work in an alternate sectors of the market for wages appropriate to their skill and experience.

Various hospitals in Victoria have already notified members of NAAA of the direction issued by the Secretary of the Department of Human Services pursuant to Section 42 of the Health Services Act 1988. All agencies are able to provide services on that basis if they wish to and it would appear that the tender process is largely superfluous, save in its bid to reduce the overall number of agencies able to provide services.

The underlying issues remain the same and NAAA submits that the granting of authorisation to HPV for use of the amended tender process would allow a process to be put in place that would generally diminish business efficiency of participating public hospitals. Fix or control the salaries of nurses, prevent agencies from more generally supplying nursing staff to hospitals, remove choice from health services to

seek nurses from agencies (other than those who have successfully tendered) and

impede or negate competition in the area of provision of nursing services to public

hospitals.