



Public Consultation: Draft Sustainable Healthcare Module

Submission by

Australian Podiatry Association (APoDA)

January 2023



Australian Podiatry Association

The Australian Podiatry Association (APodA) is Australia's national peak body representing podiatrists.

The Association is steeped in a long history of integrity and community care and advocating for the profession.

The APodA is committed to advancing podiatry to improve foot health in the community and to improve national standards. The positive impact of podiatric care changes the lives of one in five Australians who suffer from foot pain.

Through the profession's support, the APodA can direct advocacy efforts to emphasise removing or minimising barriers to providing a better quality of life for all Australians.

Executive summary

The APodA welcomes the opportunity to respond to the Australian Commission on Safety and Quality in Health Care's (the Commission) Draft Sustainable Healthcare Module.

The APodA congratulates the Commission on driving forward in progressing this critical area of healthcare. We look forward to participating in future consultations towards implementing sustainable healthcare programs.

The effects of climate change pose a real risk to the future health and well-being of people worldwide (Tennison et al., 2021). Human-induced climate change, including more frequent and intense extreme events, has caused widespread adverse impacts and related losses and damages to nature and people beyond natural climate variability (Pörtner et al., 2022).

Sustainable health systems are fundamental to achieving and maintaining societal health and welfare and critical for development and economic growth (WHO, 2017). In 2019 health care's global climate footprint was the equivalent of 4.4% of the global net emissions. When putting that into perspective, that would be the equivalent of the annual greenhouse gas emissions from 514 coal-fired power plants (Karliner & Slotterback, 2021).

As a member of Climate and Health Alliance (CAHA), APodA believes that striving towards a standard national approach to sustainability in healthcare is essential in improving; Australia's health system, addressing the current and future impacts of burden of disease and enhancing person-focused care.



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ApodA Position

The APodA is committed to the advancement of podiatry to improve foot health in the community, enabling mobility and independence across the lifespan. The positive impact of podiatric care changes the lives of one in five Australians who suffer from foot pain (Hill et al., 2008). In delivering a genuinely sustainable approach, it must be remembered feet are a fundamental component in achieving an independent, healthy, and carbon-neutral outcome (Evans AM, 2022).

Podiatry holds a unique and vital position in the healthcare community, addressing lower limb pain and pathology via various means; reablement, surgery, drug prescription, neurological and vascular assessment/intervention and the prescription of assistive technologies such as orthoses. This unique scope allows podiatrists to be involved in an abundance of healthcare environments across Australia.

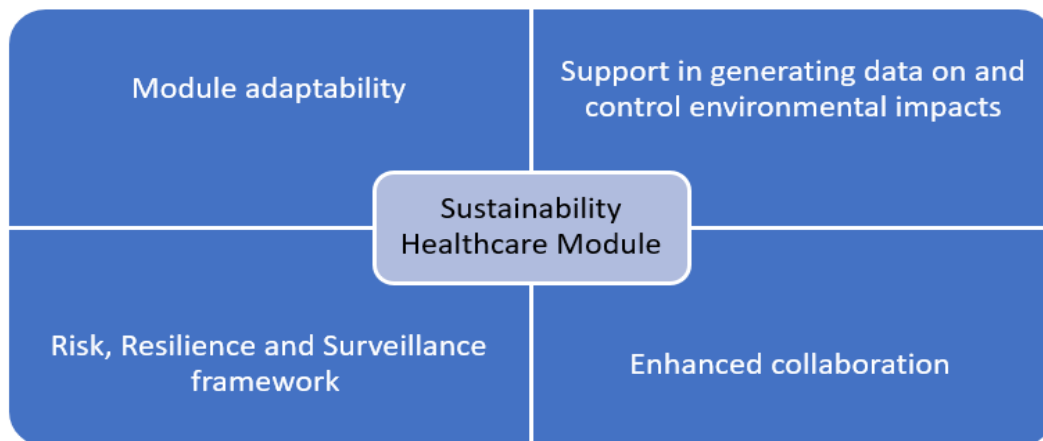
Climate change is incontestable. It is now more than ever the responsibility of health professionals and healthcare service providers who are instrumental in the community to discuss the benefits and principles of programs like the Commission's draft sustainable healthcare module and other conscience programs such as green podiatry (Evans AM, 2022).

The APodA supports the Commission's focus on delivering sustainable, adaptable and resilient healthcare services to address the dual challenges of reducing the carbon footprint of healthcare and responding to the health impacts of severe and frequent weather events due to climate change.

We value that the Commission has recognised climate change as a healthcare priority with local and global implications and that there is a current lack of standardised regulations or guidelines on sustainable healthcare.

Whilst this initiative is a positive step towards building a national approach to effecting the change of structures, processes and practices of healthcare services here in Australia, there is need for broader collaboration and unification in order to approach a long-lasting national approach to safety and quality (Barr et al., 2019).

Areas for Focus: The APodA propose the following areas of focus when establishing a robust and effective sustainability healthcare module:



Conclusion

The activities of healthcare services and systems result in positive and negative impacts on the environment within which they are embedded. In addition to reducing damage or harm, environmental sustainability focuses on achieving simultaneous improvements in human and environmental well-being (WHO, 2017).

Building an approach that seeks to support health service organisations to include sustainable measures and targets will require a multifaceted approach with an ability to adapt to the unique nature of the industry.

Smit & Pilifosova, 2001 highlighted the need for an organic and adaptable angle when focusing on adjustments in ecological, social, or economic systems in response to actual or expected climate stimuli and their effects or impacts.

It will inevitably be through a unified and collaborative approach; a level of scrutiny will allow for harmonising overlapping or duplicated efforts (Barr et al., 2019).

The proposed draft module is a clear commitment to establishing a foundation that will aid in delivering sustainable healthcare literacy at the level of individual health service and establishing a unified approach to implementing sustainable healthcare goals (Wyns et al., 2022). To improve the uptake and sustainability of this proposed module, peak industry bodies, such as Climate and Health Alliance (CAHA) and Allied Health Professions Australia (AHPA), need to be engaged early in the development to establish a cement buy-in to the future of this program.

APodA Recommendations

Recommendation 1: Module adaptability – encapsulate and reflect the diverse healthcare landscape in Australia

- Allow for adaptation to accommodate the broad spread of healthcare services– public, private, community, rural, remote, and metropolitan.
- Use of targeted language. Effective use of language that empowers an organic approach to communication with a scope to cater for culturally diverse stakeholders.

Recommendation 2: Support in generating data on and for the control of environmental impacts

- Focus on guiding the generation of data in a sustainable and efficient format
- Establish standard criteria to enhance the capabilities of businesses without economic penalty

Recommendation 3: Development of Risk, Resilience and Surveillance Framework

- Support the creation of assessment matrices to aid in the evaluation, assessment, management, and avoidance of impacts from climate change (Climate change in Australia, 2022)
- Aid in the development of novel surveillance and facilitating engagement across sectors (Ebi et al., 2018)

Recommendation 4: Enhanced collaboration

- Focus on collaborative governance to bring actors and resources together effectively and efficiently (Frankowski, 2019).
- Establish avenues for collaboration to address known barriers, such as time constraints and resource limitations (Walpole & Mortimer, 2017).

Response to Survey

1) Is there a need for a Sustainable Healthcare Module for health service organisations?

Yes, there is a need and demand for a Sustainable Healthcare Module for Health Service organisations.

2) Please provide comments as to why a Sustainable Healthcare Module is necessary?

The establishment of a Sustainable Healthcare Module is paramount in supporting health service organisations to include sustainability measures and targets when setting priorities and strategies.

The development of this module will also aid in anticipating, recognising and responding to changes in climate-based health demands, all the while delivering a unified approach to sustainable healthcare literacy at the level of individual health service (Wyns et al., 2022).

If effectively executed, the draft Sustainable Healthcare Module will support the building of resilient systems to plan for and adapt to climate threats and use available resources while minimising waste.

This module offers the framework for healthcare organisations to focus on data as a means to address sustainability. It also allows these same organisations to generate data on and control environmental impacts that can otherwise be limited by legacy infrastructure and complex supply chains.

As in other domains of performance, healthcare sustainability measurement and reporting must proceed from a clear conceptual framework and statement of purpose. Measurement must reflect strategic goals instead of letting goals become dictated by ease of measurement (Hensher & McGain, 2020)

3) Do you believe a Sustainable Healthcare Module is an effective mechanism for building climate resilience in healthcare services?

A Sustainable Healthcare Module is but one possibly effective mechanism for building climate resilience in healthcare services.

Establishing a module by itself should not be considered adequate or sufficient. There is a need for a unified and collaborative approach in the establishment of a truly sustainable model. To formulate a sustainable approach, the involvement of industries/professions is more likely to result in a successful base.

Whilst we may not have the answers, the approach of engaging the industry would be strongly recommended. This strategic approach can be delivered through industry leads, such as Allied Health Professions Australia (AHPA), in the form of workshops and stakeholder forums.

4) Do the actions in the Sustainable Healthcare Module address key sustainability and climate-resilience concerns?

The broadness of the draft Sustainable Healthcare Module allows for its actions to be interpreted as being appropriate in addressing key sustainability and climate resilience concerns.

Due to the promising impact of this project and the possibility of it being a tool for international reference, it would be recommended to more closely align the actions outlined in the draft Sustainable Healthcare Module with the WHO's Guidance for Climate-Resilient and Environmentally Sustainable Health Care Facilities (WHO, 2020).

The WHO's Guidance for Climate-Resilient and Environmentally Sustainable Health Care Facilities highlights four fundamental requirements for providing safe and quality care (WHO, 2020), which should be used as fundamental areas of focus when establishing actions:

1	Health Workforce Adequate numbers of skilled human resources with decent working conditions, empowered and informed to respond to these environmental challenges.
2	Water, Sanitation, Hygiene and Health care Waste Management Sustainable and safe management of water, sanitation and health care waste services
3	Energy Sustainable energy services.
4	Infrastructure, Technologies and Products Appropriate infrastructure, technologies, products and processes, including all the operations that allow for the efficient functioning of the health care facility.

5) Is the language and format of the document appropriate?

Sustainability is a focus of many up-stream and down-stream programs and initiatives, at local and international levels.

As a result of the complex interconnecting nature of this topic, it would be firmly guided that plain language be prioritised when evaluating any documents appropriateness.

Australia and its healthcare services are as diverse as the people it cares for. Through the adoption of plain language as a medium, this and future documents can be effectively translatable across multiple disciplines and organisations (Warde et al., 2018).

In focusing on appropriate use of language, we also need to be aware of cultural diversity, sensitivity and international relevance. There is a need in this initiative in establishing a national sustainability healthcare standard that seeks to communicate at a level that not only will adapt to the diverse cultural and literacy needs of those in Australia but develop to a level that has the capacity to be used on a global stage.

To guide the reader/user of this module to utilize what is deemed appropriate language better, resources that aid in its execution would be warranted, such as interpreter services, a better understanding of cultural norms and developing effective communication strategies.

6) Will the actions in the Sustainable Healthcare Module support your organisation to mitigate, adapt or build climate-resilience and identify opportunities to improve the sustainability of health services?

Due to the healthcare services environment here in Australia we generally find programs and initiatives form in siloes, with little to no unified drive from the currently fragmented government departments.

As mentioned earlier in this submission, the proposed draft module is a clear commitment to establishing a foundation that will aid in delivering sustainable healthcare literacy at the level of individual health service.

Without support from government, healthcare peaks bodies and private/public health actors the capability for change will find itself strained.

The APodA recommends the following:

- Unify a diverse spread of actors through a proposed broader national sustainability focus on healthcare, which will encapsulate this program as part of a larger long-term initiative
- Aim to harmonise overlapping and duplicated efforts, through central government bodies, like the newly formed National Health Sustainability and Climate Unit and other peak industry bodies, such as Allied Health Professions Australia (AHPA)

7) Should the Module be assessed by independent external accrediting agencies?

Yes, the APodA supports the concept of the Sustainability Healthcare Module being assessed by independent external accrediting agencies.

A transparent external assessment process will offer currency to the user and rigour to the module from an educative perspective.

8) If the Sustainable Healthcare Module is not progressed, are there other approaches the Commission should consider?

The need for decisive and unified action in addressing health implications and impacts of climate change has been well established, as is evident via the federal government's 2022 budget commitment to developing a National Health Sustainability and Climate Unit in an effort to reduce health sector emissions (Australian Government Department of Health and Aged Care, 2022).

If the Sustainable Healthcare Module is not progressed, there will still remain a need for all stakeholders to pursue. Reflecting upon effectiveness and efficiency, an industry-wide collaborative approach supported by upstream strategic government funding will offer durability and legitimacy.

In the scenario that the Sustainable Healthcare Module does not proceed, we, as Australians and members of a global community, must work together with strategic input from industry leads such as Allied Health Professions Australia and the university sector to engrain a sustainable healthcare system for the future health of our country.

9) Further comments in relation to the Module.

Areas that would offer support to the effectiveness and durability of the Draft Sustainable Healthcare Module:

- Tertiary education providers – it has been demonstrated that the effectiveness of a climate-change and sustainability module is reinforced when undertaken at a tertiary level (Dunne et al., 2022)
- Collaborative governance – Focus on utilising collaborative governance to coordinate multiple micro-level joint initiatives as a means to function partly as a platform for bringing actors and resources together successfully (Frankowski, 2019)
- Focus on diversity management - establishing a focus on workforce diversity and sustainable infrastructure will drive policy practices, and promote workforce inclusion, address the needs of diverse patients, staff, and communities through cultural and linguistic competence (Dreachslin et al., 2017).
- Sustainable Development Goals – the development of a nationally standardised approach to selecting sustainable development goals and relevant indicators with implications for healthcare facilities (Hák et al., 2016).

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