



15 July 2011

Ms Anne Trimmer
Chief Executive Officer
Medical Technology Association of Australia
PO Box 2016
North Sydney NSW 2059

Dear Anne

MTAA Code of Practice Review

Thank you for your letter to the Australian Nursing Federation (ANF) informing us of the review of the Code of Practice of the Medical Technology Association of Australia (MTAA) and inviting our participation.

With a membership of over 200,000 the ANF is the largest professional and industrial organisation in Australia for nurses, midwives and assistants in nursing. Members of the ANF are employed in a wide range of settings in urban, rural and remote locations in both the public and private health and aged care sectors.

The core business of the ANF is industrial and professional representation of our members and of the professions of nursing and midwifery.

The ANF participates in the development of policy relating to nurses and midwives on issues such as: practice, professionalism, regulation, health and aged care, community services, veterans' affairs, education, training, workforce, socio-economic welfare, occupational health and safety, industrial relations, social justice, human rights, immigration and migration, foreign affairs and law reform.

Given the numbers of ANF members across all areas of the health and aged care sectors, our organisation has a strong interest in all medical technology used in treatment regimes, including medicines and therapeutic devices. A concern for the well-being of the people for whom the nursing and midwifery professions provide care naturally extends to the statutory and self-regulatory processes governing the promotion of these items. As members of regulated professions, nurses and midwives appreciate the importance of codes of ethics and conduct in defining and maintaining standards in the interests of protection of the public. The ANF therefore fully supports the need for a code of practice in relation to medical technology, as a protective mechanism in the health and aged care environment.

To assist the review of the *MTAA and MTANZ Code of Practice (6th Edition) 2010* (MTAA Code) the ANF offers a few brief suggestions for strengthening the code.

The industrial and professional organisation for nurses and midwives in Australia

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australian nursing federation

As you will be aware the ANF participated in the working group which met during 2010 to consider issues relating to promotion of therapeutic goods. An outcome was a recommendation from the working group of a list of operational areas to be included in each therapeutic industry sector code. While the MTAA Code appears comprehensive the ANF suggests the current review include a thorough comparative analysis with the Working Group's recommendations, to ensure inclusion of all items.

The ANF considers that the paramount purpose of the MTAA Code be the protection and improved health outcomes of health care consumers, as well as safety for health professionals, in the use of therapeutic products. This is no doubt the intent of the general principle statement: *Companies must place the highest priority on the safety and welfare of users of their Medical Technologies*. However, the ANF advises that this intent needs strengthening by a paragraph in the Explanatory Notes which has explicit reference to therapeutic products industries ensuring the safety of health care consumers and health professionals.

Another section where it is worth strengthening with words on the aspect of safe use of therapeutic products is in an explanatory note against item 8.1 in relation to "interaction with consumers".

An important component of safety is occupational health and safety (OH&S). The ANF recommends that this be incorporated in the Code. For example, highlighting an obligation of manufacturers of therapeutic goods to educate consumers of health care and health professionals on the safe use of these products. A related point is the obligation of these manufacturers to have measures in place to ensure OH&S policies apply to the manufacturing process.

Nurses and midwives are very often the first port of call for industry representatives from therapeutic product companies. For this reason, the ANF strongly suggests that "a publicity campaign upon commencement of the Code (Reference 9.6 Publicising the Code, p.40) include the nursing and midwifery professions. Given our extensive membership within these professions the ANF could assist in publicising the release of the revised Code.

Thank you for the opportunity to review the MTAA Code. The ANF looks forward to learning of the finalisation of the review and would be happy to disseminate information to our members on the published Code of Practice.

Should you require any additional information or wish to discuss this matter further please contact Elizabeth Foley, Federal Professional Officer, on (03) 9602 8500 or elizabethf@anf.org.au.

Yours sincerely,

A handwritten signature in black ink, which appears to read "Lee Thomas".

Lee Thomas
Federal Secretary

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