

**Submission
No 17**

THE PROMOTION OF FALSE OR MISLEADING HEALTH-RELATED INFORMATION OR PRACTICES

Organisation: The Royal College of Pathologists of Australia (RCPA)
Name: Dr Debra Graves
Position: Chief Executive Officer
Date Received: 13/12/2013

RECEIVED
13/12/2013

5

6 December 2013

Committee on the Health Care Complaints Commission
Parliament House
Macquarie Street
Sydney NSW 2000

Dear Sir/Madam

Inquiry into the Promotion of False or Misleading Health-Related Information or Practice

The Royal College of Pathologists of Australasia (the College) would like to make a submission relating to this inquiry. The College is the leading organisation representing pathologists in Australasia. Its mission is to train and support pathologists and to improve the use of pathology testing to achieve better healthcare for patients.

The College is aware that at times individuals/organisations advertise tests directly to the public, which are outside the context of medical testing. On other occasions, tools and devices used to perform such tests are also promoted which are not registered on the Australian Register of Therapeutic Goods. The College considers these as serious issues as tests are offered without structures, processes, training, competencies and commitment to quality and accreditation requirements. Such tests should not be the basis for decision making in healthcare because they are potentially unreliable and harmful. Such tests bypass the chain of accountability in which healthcare professionals are responsible for the requesting, testing and reporting of tests.

The Commonwealth Government requires all pathology laboratories wishing to access Medicare payments to comply with National Pathology Accreditation Advisory Council (NPAAC) requirements and guidelines which are then assessed as part of the NATA/RCPA accreditation process. Tests performed by an accredited pathology laboratory are normally assessed for their analytical validity, clinical validity and clinical utility. Tests done in an unaccredited pathology laboratory may not have undergone such checking and the results may be inaccurate and unreliable with patients ending up with a wrong diagnosis.

The College is of the view that the Health Care Complaints Commission must have the adequate powers to investigate and take appropriate action against those who promote misleading health related information.

Yours sincerely


Dr Debra Graves
Chief Executive Officer