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**Dr Peggy Brown**

**Position Director General**

**ACT Health Directorate**

**Attn: Project Officer Ros Garrity; [Ros.Garrity@act.gov.au](mailto:Ros.Garrity@act.gov.au)**

Dear Dr Brown and Ms Garrity,

**Re: 2014 ACT Health Smoke Free Environment Policy**

The Health Care Consumers' Association (HCCA) of the ACT was formed over 30 years ago to provide a voice for consumers on local health issues and now provides opportunities for health care consumers in the ACT to participate in all levels of health service planning, policy development and decision making.

HCCA welcomes the opportunity to provide feedback on the updated ACT Health Smoke Free Environment Policy. We consulted our membership on this policy and undertook a series of semi-structured interviews to inform this response.

This policy is reflective the Australian Charter of Health Care Rights particularly in regards to the charter right of Safety, when reducing exposure to the ill-effects of smoking while attending ACT Health facilities. HCCA supports the implementation of this policy, however has some concerns around the support for visitors of ACT Health facilities, and how to address non-compliance with the policy for visitors.

**General Comments**

Whilst the strategy for staff and patients is well developed, there is not a clear strategy or description of resources that will be allocated to visitors, particularly those who may have to access an ACT Health facility over a long period of time. A visitor may be accessing the campus on a one off visit or could be returning for days, weeks or months to visit a patient, or supporting someone at an outpatient clinic. As this policy applies to all people entering ACT Health buildings it should also provide equal support to all people.

Consumers' who contributed to this draft have observed that visitors who are

smoking, particularly at The Canberra Hospital, are often the most *'adversarial and belligerent'* when approached and informed about the policy. HCCA is also aware that there has been a number of interactions with security guards on smoking management issues with patients and visitors on the campus, particularly for repeat breaches and non-compliance with requests to not smoke. Importantly there needs to be consistent approach to monitoring and enforcing the policy.

Whilst it is clear that there is a Standard Operating Procedure (SOP) for the provision of assistance to nicotine dependent staff, it isn't clear that an equivalent SOP has been provided for managing nicotine dependent visitors and carers.

Within our membership we have a number of people who are QUIT trained. They are very keen to see the development of a SOP for the support and assistance for visitors, carers and tenants of ACT Health facilities, helping visitors address their tobacco use through a brief intervention for the visitor and immediate access and referral for nicotine replacement therapy, quit packs, a quit fax referral, or the availability of a phone to call QUIT line.

HCCA suggests the implementation of a communication strategy to support visitors to ACT Health facilities so that they are aware of the changes.

A clear communication and implementation strategy that is consistent with all people who enter ACT Health facilities, not just patients and staff, as well equal access to assistance for those who are nicotine dependent is needed.

### **Specific Comments**

Below are specific comments for sections of the draft policy, under the heading used in the policy:

#### **Scope**

HCCA suggests that "e cigarettes" should be specified with a capital "E" "e cigarettes" can be confusing to readers, as it could be perceived as a typographic error.

### **Evaluation**

HCCA suggests the following additional monitoring measures be included in the policy:

#### **Quantitative**

- Number of breaches involving electronic cigarettes as there is a wide spread perception that electronic cigarettes are exempt and able to be smoked anywhere.
- Number of interactions with security guards on smoking management issues, particularly repeat breaches and non-compliance with requests not to smoke

#### **Definition of Terms**

HCCA suggests changing the definition of Patient to; *refers to any person receiving/utilising ACT Health Directorate services.*

In conclusion, HCCA welcomes the introduction of the ACT Health Smoke Free Environment Policy in September of this year, and suggests amending the policy ensure equal access to support for all those who enter ACT Health facilities including visitors, carers and tenants.

We are happy to discuss our submission further.

Yours sincerely,



Darlene Cox  
Executive Director  
Health Care Consumers' Association

4<sup>th</sup> June 2014