

# **Australian and New Zealand College of Anaesthetists POLICY ON DEVELOPING SUBMISSIONS AND REPRESENTING ANZCA TO EXTERNAL ORGANISATIONS**

## **1. PURPOSE**

The purpose of this policy is to provide an outline to ANZCA Council, President, Fellows, trainees and staff on developing submissions to a wide range of stakeholders on relevant issues. The policy also covers other types of representations, including meetings and other forums that ANZCA representatives participate in on behalf of ANZCA. For the purposes of this document reference to ANZCA includes the Faculty of Pain Medicine (FPM).

## **2. BACKGROUND**

ANZCA has been increasingly proactive in preparing submissions and in making representations to government and other stakeholders on a range of issues that are in the interests of the community and the development of the profession. To ensure consistent messaging and alignment with established ANZCA policies, procedures and guidelines it is important from an organisational perspective that a standardised approach is followed by all ANZCA representatives, including staff. We acknowledge and value the contribution by our Fellows and trainees as ANZCA representatives and this document seeks to provide guidance and support.

ANZCA develops different types of policies for different purposes. For further information refer to the [policy framework](#).

This document articulates the principles and approach for developing submissions and making representations to a range of external stakeholders including:

- National and state/territory governments and health jurisdictions.
- Australian Health Practitioner Regulation Agency, including the Medical Board of Australia and the Australian Medical Council.
- Medical Council of New Zealand.
- Health Workforce Australia and Health Workforce New Zealand.
- External standards bodies.
- Committee of Presidents of Medical Colleges and Council of Medical Colleges in New Zealand, and other colleges.
- Australian Society of Anaesthetists, New Zealand Society of Anaesthetists.
- Pain Australia, pain societies, healthcare sector.

### 3. GENERAL PRINCIPLES

The following principles need to be observed when developing submissions or making representations on behalf of ANZCA:

- Assessing the **relevance** and relative importance of the issue or request for representation.
- Quantify **risk** by analysing the issue and implications (for example, environmental and political).
- Test **alignment** with the ANZCA mission, vision and relevant ANZCA policies, procedures and guidelines (for example, the ANZCA professional documents).
- Ensure **consistency** of messaging and branding.
- Establish **expert consensus** by consulting relevant internal stakeholders (Fellows, trainees, staff, national and regional committees, other committees of ANZCA Council, special interest groups).
- Maximise **efficiency**, inviting participants to contribute as early as possible.
- Secure presidential **endorsement**, noting the president is not always the signatory (other potential signatories include the chief executive officer, the relevant committee chair, or delegated ANZCA representative).
- If **organisational endorsement** is required the ANZCA Executive must be notified and advice sought as appropriate.

### 4. DEVELOPMENT AND COMMUNICATION

In deciding how to develop submissions and communicate the issues within, it is important not to be overly prescriptive; each submission is unique in terms of subject matter and audience. Advice can be readily obtained from the ANZCA Executive (via the President or CEO), or Policy Unit, as required. While there can be some general principles regarding (a) development of submissions and (b) communication, the approach needs to be tailored on a case-by-case basis. Submissions are one part of a comprehensive communications strategy which includes external stakeholder relations.

#### 4.1 General development process

- Assess whether to respond to a consultation request, request for ANZCA representation or initiate discussion on a policy issue, guided by the dimensions detailed in table 1.

**Table 1. Dimensions that must be considered for each submission or representation**

<b>Dimension</b>	<b>Detail</b>
<b>Issue</b>	<ul style="list-style-type: none"> <li>• Anaesthesia.</li> <li>• Perioperative medicine.</li> <li>• Pain medicine.</li> </ul>
<b>Jurisdiction</b>	<ul style="list-style-type: none"> <li>• Bi-national.</li> <li>• National (Australia or New Zealand).</li> <li>• State/territory.                             <ul style="list-style-type: none"> <li>○ Local issues and sign-off.</li> <li>○ Local issues for information of head</li> </ul> </li> </ul>

	<p>office/NZ office.</p> <ul style="list-style-type: none"> <li>○ Local issues with college wide implications (for example, precedent-setting and/or national reach) and head office sign-off.</li> </ul>
<b>Organisational lead</b>	<ul style="list-style-type: none"> <li>• ANZCA Council/FPM Board.</li> <li>• Committees of ANZCA Council/FPM Board, including national and regional committees.</li> <li>• Representatives on external committees.</li> </ul>
<b>Entity</b>	<p><b>ANZCA</b></p> <ul style="list-style-type: none"> <li>• President.</li> <li>• Chief executive officer (CEO).</li> <li>• Director of professional affairs (DPA).</li> </ul> <p><b>Faculty of Pain Medicine</b></p> <ul style="list-style-type: none"> <li>• Dean.</li> <li>• General manager (GM) FPM.</li> <li>• DPA FPM.</li> </ul> <p><b>Branding</b></p> <ul style="list-style-type: none"> <li>• Branded lead ANZCA.</li> <li>• Branded lead FPM (ANZCA).</li> <li>• Branded both ANZCA and FPM (explicitly co-badged, in contrast to first option).</li> </ul>

- General manager policy in consultation with the president and chief executive officer decides whether to make a submission and the general direction of the report.
- GM policy and/or member of Policy Unit consults initially with the president, DPAs, and other councillors and/or Fellows with relevant expertise, relevant committees of ANZCA Council, general managers, and Faculty of Pain Medicine representatives where relevant.
- Submission is developed with input from the consultation group (above) through a series of draft documents, co-ordinated by the Policy Unit via email. The ANZCA Style Guide (<http://www.anzca.edu.au/communications/booklets-and-brochures/pdfs/ANZCA%20Style%20guide%202011%20P2.pdf>) should be consulted to ensure consistency.
- Final submission is endorsed by president, in consultation with the relevant DPA(s) where appropriate.
- For FPM specific issues, final sign-off is by the dean or DPA FPM, as advised
- ANZCA Council is informed and provision is made for follow-up action as required.
- If the matter is New Zealand-specific, the policy adviser consults with the general manager New Zealand and the chair of the NZNC on whether to respond. The policy adviser consults with the NZNC, DPAs, the ANZCA Policy Unit and others as appropriate. The chair of the NZNC endorses submissions. For FPM-specific matters, the process is the same, involving the FPM NZNC.
- If the matter involves a region, the regional committee chair should be consulted at an early stage and invited to participate. The chair is responsible for consulting the wider committee and keeping committee members informed.

- General advice on developing submissions is available within the policy framework.
- Other guides/checklists etc.

#### **4.2 Communications planning for selected submissions**

ANZCA may choose to publish, disseminate or otherwise promote particular submissions. Submissions are released on a case-by-case basis, depending on (but not limited to) factors such as the topic, the ability to promote ANZCA's position through promotion, the sensitivity of the issue, timing, and geographical location. The following approach is recommended:

- The Policy Unit seeks permission from the co-ordinating body to release ANZCA's submission to Fellows and/or the public.
- The GM communications, in consultation with the President/CEO, decides whether a media statement should be issued (this option is only pursued occasionally).
- If the submission is New Zealand-specific, the GM New Zealand consults with the GM communications, the New Zealand communications manager and the chair of the NZNC to decide whether to add the submission to the New Zealand Committee webpage.
- If the submission involves a region, the Policy Unit forwards the submission to the chair of the regional committee who is then responsible for circulating it to committee members and determining to upload the submission on to the regional webpage.
- The Policy Unit uploads the submission to the ANZCA website (accompanied by an executive summary, if appropriate).
- The submission and key points are noted in the *ANZCA E-Newsletter* with a link to the submission (and executive summary, if applicable), if available on the website.
- If appropriate, the submission is profiled in the *ANZCA Bulletin*.

#### **4.3 Representations to government or government departments/agencies**

In terms of governmental or departmental representations, the decision to approach and maintain dialogue on specific issues needs to be made on a case-by-case basis, and include consideration of whether written submissions and/or meetings are most appropriate.

ANZCA must follow recognised conventions. For example, in the case of a governmental inquiry it would be inappropriate to seek to speak to government officials until the inquiry report has been released. In some instances representations will need to be made on a confidential basis.

If the College wishes to respond to or comment on inquiry findings or similar government policy announcements, it can consider a number of initiatives including (but not limited to):

- Development of a communications plan specific to the particular issue.
- A formal media release drafted by the GM communications stating ANZCA's position/response.
- A high visibility news item in the *ANZCA E-Newsletter*.
- President, councillor or CEO representations to government on either a standing

- or specific meeting request basis.
- GM policy, GM communications, and New Zealand staff and NZNC chair (where relevant) maintaining ongoing contact with government officials.

## 5. CONTACTS

The Policy Unit co-ordinates the College's submissions. Any questions or concerns about this policy and associated documents can be directed to the Policy Unit via [policy@anzca.edu.au](mailto:policy@anzca.edu.au) or +61 3 9510 6299.

## 6. RELATED ANZCA DOCUMENTS

### 6.1 ANZCA policy framework

### 6.2 Terms of reference for ANZCA/FPM representatives to external organisations

## 7. CHANGE CONTROL REGISTER

Version	Author	Approved by	Approval Date	Sections Modified
1	Policy Unit	Council	February 15, 2014	Created.