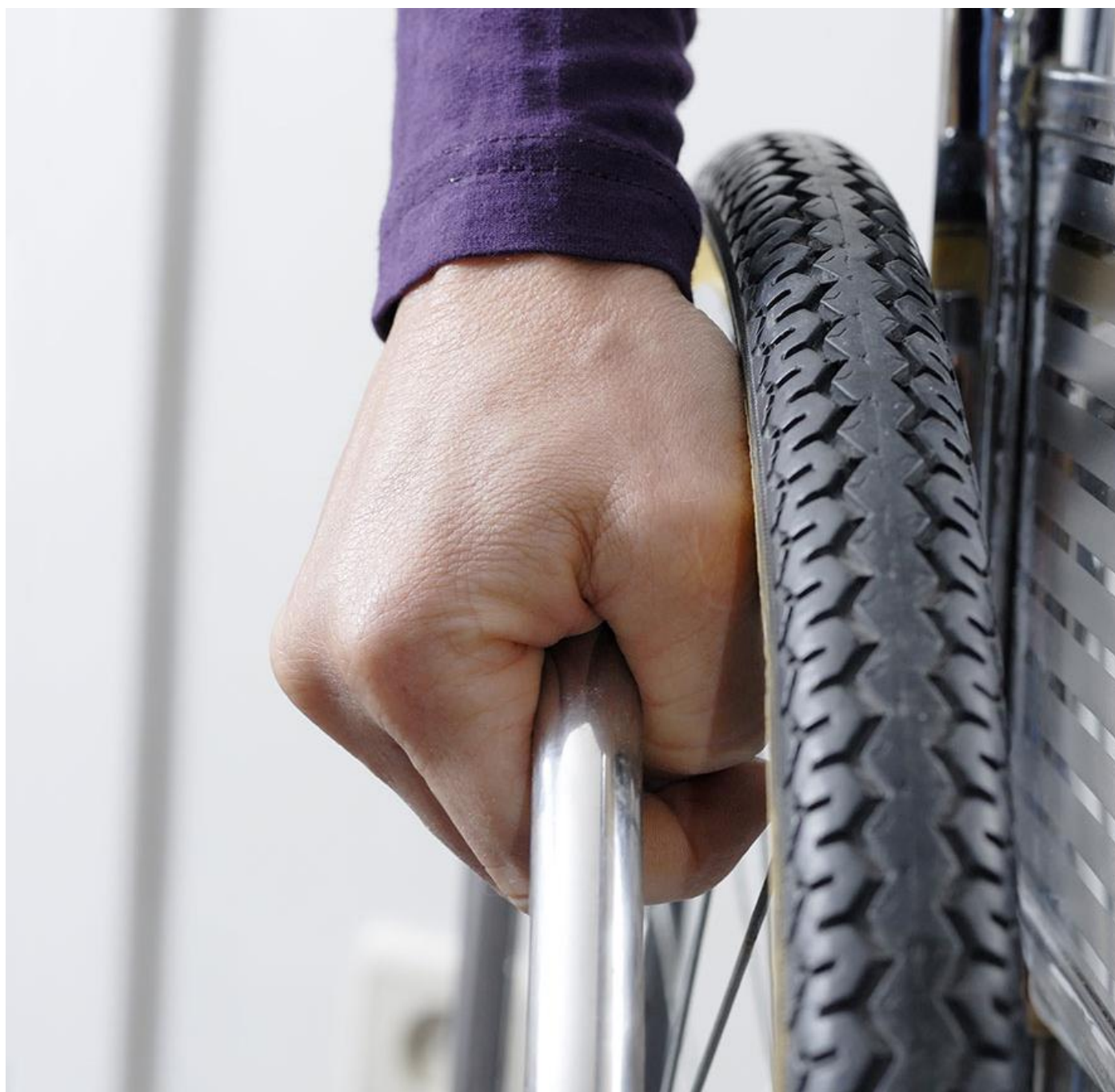


Australian Commission on Safety and Quality in Health Care Diagnostic
Imaging Accreditation Scheme Standards Review July 2022

Spinal Cord Injuries Australia Submission - July 2022



Australian Commission on Safety and Quality in Health Care Diagnostic Imaging Accreditation Scheme Standards Review July 2022

Background:

Spinal Cord Injuries Australia (SCIA) is a member representative organisation for people with a spinal cord injury and similar neurological conditions that cause physical disability. SCIA greatly appreciates the Commission undertaking this review and providing SCIA with the opportunity to make this submission and highlight the inequitable access to diagnostic imaging services and facilities for people with physical disability, particularly wheelchair users, as well as women's health services including mammography.

SCIA has been surveying its members and other people with physical disability in collaboration with the Physical Disability Council of NSW (PDCN), Cerebral Palsy Alliance (CPA), Muscular Dystrophy Association (MDA) and Forward Ability (formerly Paraquad NSW). The survey responses describe the extent people with physical disability using wheelchairs needed to obtain diagnostic imaging which included:

- some people taking their own mobile floor hoists and sling to the diagnostic imaging services
- having to rely on diagnostic imaging staff to physically transferring the patient to one from the diagnostic imaging machine or examination table creating a risk to the patient and potential work health and safety issue for the staff
- and some women with physical disability not having regular women's health checks including Pap smears which may result in severe medical conditions not been detected early enough

SCIA hopes that this submission, which contains the attached SCIA Member's Survey results, is able to influence the Commission's final report recommendations to ensure all diagnostic imaging services and their related accreditation requires them to ensure they provide appropriate facilities and services to enable people with physical disability use wheelchairs to have equitable access to these essential services as the Commission is reviewing the *Diagnostic Imaging Accreditation Scheme Standards to minimise the risk of harm and improve the care of patients* and the Commission is seeking feedback on:

- Safety and quality issues faced by patients accessing diagnostic imaging services
- Areas of variation in diagnostic imaging services
- Safety and quality data to monitor diagnostic imaging
- A model of accreditation's

Furthermore, SCIA would like to bring to the Commission's contention that many women with physical disability who are unable to access diagnostic imaging services, particularly mammography as well as women's health checks such as pelvic examinations and Pap smears (of which are important but outside of the scope of this review) is resulting in these women being highly susceptible of missing early detection of potential life-threatening conditions.

Submission:

SCIA hopes the Commission's review of diagnostic imaging services and facilities will enable the Commission to make amendments to the accreditation requirements of diagnostic imaging service providers to ensure the needs of people with physical disability are addressed and results in positive outcomes for them.

People with physical disability who are reliant on wheelchairs and unable to independently transfer to and from diagnostic imaging equipment or height adjustable examination tables encounter access barriers can prevent them from obtaining essential diagnostic imaging services which can be life-threatening if early detection of medical problems are not detected.

Women using wheelchairs often find it difficult or impossible to have a mammogram due to various reasons including:

- the design of mammography equipment not being able to be placed into position for women using wheelchairs if the wheelchair armrests are unable to be removed
- the lift access to the mobile mammogram service not being in service or unreliable so SCIA was told by the mammography booking service receptionist that women using wheelchairs are referred to mammography services at public or private hospitals to have the mammography, however, this may not be the most convenient option requiring extra travel and inconvenience
- women who are required to have mammograms be informed that the mammogram is unable to be taken if the wheelchair armrests can't be removed so the women have adequate time to book diagnostic imaging services at another location that may be located further away and would require women to incur a relatively expensive transport cost if using a taxi or wheelchair accessible taxi service (even if women are eligible for a government funded taxi transport subsidy scheme).

For people with disability using wheelchairs it can be also difficult if not impossible to undergo certain types of diagnostic imaging which require a patient to be transferred to and from an imaging bed or examination table if there is no lifting hoist and sling.

Some diagnostic imaging rooms are small and have inadequate space for both the patient using a wheelchair and a mobile floor hoist (if there is a hoist available). This issue can be addressed if a ceiling hoist and sling is provided in the diagnostic imaging rooms (or another room) to transfer the patient onto a bed with wheels and taken to the diagnostic imaging room as a ceiling hoist and sling does not require any floor space and more versatile in a relatively small room with just enough space for the person using a wheelchair.

Furthermore, people with physical disability requiring bone density scans, and possibly other scans, are required to have their weight measured which may only be possible if weighing scales designed to attach to hoists and slings are available at the diagnostic imaging services,

SCIA made a submission to the August 2017 Senate inquiry into the *Availability and Accessibility of Diagnostic Imaging Equipment around Australia*, although the Senate inquiry was focusing on the location of diagnostic imaging services around Australia and not the physical access to the diagnostic imaging equipment.

SCIA's submission to that review highlighted all of the above-mentioned issues being raised in this submission. The Senate inquiry final report on December 2017 referenced SCIA's submission and recommended all state and territory governments ensure diagnostic imaging services are accessible for people with physical disability, however, the report recommendations are not mandatory to be implemented

SCIA is hoping the Commission's review of the *Diagnostic Imaging Accreditation Scheme Standards to minimise the risk of harm and improve the care of patients* strongly considers the issues highlighted by SCIA and the Commission has the authority to implement its recommendations to address the ongoing negative impact on people with physical disability.

SCIA is also hoping the Commission will recommend the Accreditation Standards require all public and private diagnostic imaging services and facilities, including the premises, be required to include hoists and slings, weighing scales devices that it attach to the hoists, height adjustable examination tables and mammography equipment that is of a design that can be used by patients sitting in wheelchairs. As well as wheelchair accessible unisex toilets and designated accessible parking spaces.

Recommendations:

The Commission amend the Accreditation Standards to require:

- All diagnostic imaging facilities provide a ceiling hoist (or possibly a mobile hoist) and different sized slings, as well as height adjustable examination tables to enable people with physical disability using wheelchairs to have equitable access to these facilities.
- The diagnostic imaging services to only use mammography equipment that are designed so patients using wheelchairs have equitable access to mammography services

- Mobile breast screening facilities to ensure that the wheelchair access hoist to undertake routine maintenance and servicing to ensure they are working when patients using wheelchairs need mammography and can book a service in confidence without being required to travel to another more accessible public or private hospital or mammography service.
- Patients who require mammography be given adequate prior notice if the mammography cannot be done if the wheelchair armrests cannot be removed so the patient has adequate time to organise a mammography at an alternative diagnostic imaging services.
- All diagnostic imaging facilities be required to have a weight measuring device that can be attached to the hoists to enable people with disability who need their weight measured for a diagnostic image such as a bone scan.
- All diagnostic imaging services to have unisex wheelchair accessible toilets that are compliant with the *Access to Premises Standards*
- All diagnostic imaging services that provide customer parking to have wheelchair accessible parking spaces that are compliant with the *Access to Premises Standards*

Again, thank you providing SCIA the opportunity to make this submission to this timely review and if the Commission requires further information or clarification of the submission content, please do not hesitate to contact the SCIA Policy and Advocacy Department.

Yours sincerely,

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