

RECOMMENDED CHANGES TO DRAFT CODE

Standards New Zealand Private Bag 2439 WELLINGTON 6140 Fax: +64 4 498 5994 Email: health@standards.co.nz	From: (Your Name and Address) New Zealand Nurses organisation PO Box 2128 Wellington 6140 2010-05-002	
	Closing date for comment 14 May 2010	Date of your comments 14/05/10
Title: Code of Funding Practice		

Comment is preferred in electronic format using Microsoft Word 97 or above, following the layout below. Electronic drafts are available from Standards New Zealand web site at <http://www.standards.co.nz>.

The following form is for comments to be submitted electronically. Please email your comments to health@standards.co.nz

GENERAL COMMENT

Type your general comments in the box. The comment box will automatically expand to accommodate comments of any length.

The New Zealand Nurses Organisation (NZNO) welcomes this opportunity to comment on the draft Code of Funding Practice. NZNO is the leading professional body of nurses and nursing union in Aotearoa New Zealand, representing over **45 000** nurses, midwives, students, kaimahi hauroa and health workers on a range of employment-related and professional issues. Te Runanga o Aotearoa is the arm through which our Te Tiriti o Waitangi partnership is articulated.

As representative of the largest section of the health workforce whose employment conditions and professional services are significantly affected by a range of contractual relationships between the government and District Health Boards (DHBs) and Primary Health Organisations (PHOs), DHBs and PHOs and private profit and non-profit making organisations, we are pleased to see to see a Code of Funding Practice, and trust that its voluntary nature will not lessen its effectiveness. NZNO is aware of the significant duplication, waste, confusion, and sometimes risk and inequity caused by the plethora of contracts in the health sector, often subject to widely varying interpretation.

We are also aware of the benefits of transparent funding practices which respect and facilitate worker rights and safety through education and training, collective bargaining, and representation on employment issues. While the human qualities of respect, open communication and integrity are major foci of the Code, the Code is silent on the subject of the workers expected to deliver the service. NZNO strongly recommends the criteria should include reference to worker rights

and a requirement for Good Employer practice

We strongly believe that good employment practice leading to stable, productive and healthy workplaces begins with robust, fair funding for service relationships/contracts.

SPECIFIC COMMENT

Insert the number of the clause, paragraph or figure. Do not preface the number with words (i.e. 1 not clause 1). If there is no clause number, use the section heading (e.g. Preface). Insert the page, paragraph and line number as appropriate. Use a new row for each comment.

The rows will automatically expand to accommodate comments of any length. Remove unused rows, or insert additional rows as required. To insert extra rows at the end of the table, go to the last cell and press the TAB key.

Clause/ Para/ Figure/ Table No	Page No	Recommended Changes and Reason <i>Exact wording of recommended changes should be given</i>
1.Purpose of the code Bullet point 2	7	Add unions and professional organisations since both have contractual relationships with government in providing services, for example the NZ Council of Trade Unions (NZCTU) provides health and safety training; and various expert Colleges and Sections in the New Zealand Nurses Organisation provide training and credentialing for experienced roles such as emergency department triage and diabetic nurse specialist which are contracted indirectly.
1.1.4 And 1.2.3	9	Delete “and the prudent use of public funds” as it is inappropriate in this context and covered in 5.1.1.
2.4	12	We suggest that guidelines for consultation are given such as the excellent ones outlined in the State Sector Guidelines for Consultation. We strongly recommend amending 2.4. 1 to read: “Opportunity is given for the views of not-for-profit organisations to be canvassed and included during the development of new programmes or the reshaping of existing ones.” “Consultation” after the event is an oxymoron.
5.2	16	The only reference to staff is in 5.2 under Integrity where it states that they are to have the “capability and capacity to perform their task” but does not specify how or state that there is an obligation on either the funding agency or the organisation that they should be adequately resourced or supported to do so. We recommend that this clause is amended by adding “and are resourced and supported to do so”. Criteria NZNO strongly recommends the criteria should include reference to worker rights and a requirement for Good employer practice the rights of staff as worker to have access to collective bargaining, union and professional representation on employment issues. Similarly there should be a criterion for both parties to be ‘good employers’ following guidelines developed by the Human Rights Commission, for example <i>A Quick guide to the ‘Good Employer’</i> http://live.isitesoftware.co.nz/neon/documents/The%20Quick%20Guide%20to%20the%20Good%20Employer.pdf

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