



CELEBRATING 50 YEARS OF VCS

## **Submission to the Senate Community Affairs Legislation Committee in relation to the enquiry into the *National Cancer Screening Register Bill 2016* and the *National Cancer Screening Register (Consequential and Transitional Provisions) Bill 2016***

VCS makes this submission as an organisation with internationally recognised expertise in the development, building, operation and use of cancer screening registers to support public health, and as an organisation referred to in debate in the House of Representatives.

### **About VCS**

The Victorian Cytology Service (VCS Ltd) is a large not for profit health promotion charity with a 50 year history of supporting cancer screening programs in Australia.

The Vision of VCS is *'to prevent cancer and infectious diseases through excellence in the provision of public health services supporting screening and vaccination'*.

VCS has operated cancer screening registers for over 25 years. VCS was the first to design, build and operate a cervical screening register in Australia as it recognised the critical role of registries in supporting an organised program prior to the establishment of the current National Cervical Screening Program (NCSP). Since this time VCS has worked in close partnership with all stakeholders in the program, both in Victoria and in other jurisdictions, to deliver excellence in laboratory (Pap testing) and registry services, with the result that the incidence and death rates of cervical cancer in Victoria are amongst the lowest in the world.

Victoria has higher participation in screening and lower cervical cancer incidence and mortality rates than the rest of Australia, which translates to approximately 50 additional Victorian women's lives saved every year.<sup>1,2</sup> It is this long record of technical expertise and experience in ensuring effective prevention and safety of women in the cervical screening program that underpins VCS's international reputation in the field.

VCS currently operates the Victorian Cervical Cytology Registry, the South Australian Cervix Screening Register, the National HPV Vaccination Program Register and manages the Participant Follow Up Function for the Victorian participants in the National Bowel Cancer Screening Program. VCS also operates VCS Pathology (a laboratory). For further information about VCS, and its track record, please see the VCS 2015 Annual Report (attached) and also available at <http://www.vcs.org.au/publications/annual>

---

<sup>1</sup> Australian Institute of Health and Welfare. Cervical Screening in Australia 2013-14. Available at <http://www.aihw.gov.au/publication-detail/?id=60129554885>

<sup>2</sup> Victorian Cytology Service. Victorian Cervical Cytology Registry Statistical Report 2014. Available at <http://www.vccr.org/data-research/statistical-reports/annual-statistical-reports>



VCS



VCS Pathology



Victorian Cervical  
Cytology Registry



National HPV Vaccination  
Program Register

## VCS view

VCS's primary objective is to maximise the health benefits to the Australian population of the screening programs. In order to do this it is vital to protect and promote the safety and wellbeing of participants in the screening programs. VCS is fully supportive of the National Cancer Screening Register (the Register). As the Bill makes clear<sup>3</sup>, the Register is far more than an IT platform and is a critical part of Australia's cancer prevention programs, with the ultimate aim of improving and supporting the health of the population. VCS wishes to highlight two key points directly related to the Bill.

1. *The establishment of the Register is critical in supporting the transition of the NCSR to HPV testing and expansion of the National Bowel Cancer Screening Program.*

The role of screening registers has never been more critical than in this time of transition. This is of particular importance in the current time period as the National Cervical Screening Program, which has proven so successful over the past 25 years, is due to transition to a new screening method, age group and screening frequency ('Renewal') on 1 May 2017.<sup>4</sup> Ensuring that women with cervical pre-cancers and cancers are tested and managed properly during the transition from the current program to the new program is vital, as is a strong and effective registry infrastructure to closely monitor and evaluate the new program in real time. Similarly, the National Bowel Cancer Screening Program is expanding to be offered to more Australians more frequently, also requiring effective and increasingly efficient registry support.

2. *Any delays in implementing the NCSR will compromise the safety and wellbeing of women being screened due to workforce contraction at laboratories.*

VCS views any possible delay to the NCSR delivery as very serious. VCS Pathology is one of Australia's largest Pap smear laboratories, reporting 50% of all cervical cytology in Victoria. VCS is therefore very well aware that continuing the current program past the planned start date of the new program of May 2017 will be a significant challenge and will compromise the safety and wellbeing of women being screened. This is because the scientists who provide these screening services have been anticipating a major contraction of the workforce at this time and the pathology sector will struggle to retain enough scientists to provide sufficient capacity to support the current program after May 1<sup>st</sup> 2017. This could result in significant delays in providing screening results, which could compromise safety and cause anxiety amongst participants. In addition, the ability of the NCSR to maintain public and provider trust and confidence in the new program and in the Register may be compromised should a delay occur. Communication about the new program will be very difficult if timelines for implementation become staggered or unclear.

---

<sup>3</sup> See Clause 12

<sup>4</sup> Medical Services Advisory Committee Application 1276 - National Cervical Screening Program renewal. Decision made 4 April 2014. See <http://www.msac.gov.au/internet/msac/publishing.nsf/Content/1276-public>



It is for these reasons that VCS urges the Committee to review the Bill in a timely manner to ensure that Australia has in place a fully functioning register, effectively delivered on a suitable platform with appropriate expertise underpinning its end to end operations in order to meet the purposes of the Register. This will then ensure the safety and wellbeing of all participants.

In the interests of full disclosure, VCS notes that it was disappointed to be unsuccessful in its tender application for the National Cancer Screening Register. However, as a dedicated For Purpose organisation<sup>5</sup>, the ongoing success of the program is VCS's primary concern. VCS remains completely committed to cancer prevention in Australia and continues to provide clinical expertise, registry expertise and public health expertise as required to support national cancer prevention programs, including Renewal.

VCS is able to provide further information if required.

VCS hopes that the Bill can pass through in a timely manner to support the successful delivery of the NCSR for all eligible Australians and their families.

**A/Prof Marion Saville**  
Executive Director

**Ms Sandy Anderson**  
Chairman

21/09/2016

---

<sup>5</sup> As per the VCS constitution available at <https://www.acnc.gov.au/RN52B75Q?ID=EACCC2EC-C8FB-4141-9075-5B2188097B90&noleft=1>