

National Health Amendment Bill



FPI COMMENTARY SUBMISSION TO THE DIRECTOR- GENERAL: NATIONAL HEALTH AMENDMENT BILL

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CONTENTS

1. FOREWORD;
2. FPI VIEW AS SUBMITTED TO BUSA;



The Financial Planning Institute of Southern Africa

As the premier professional body for the financial services sector in Southern Africa with over 8,000 members, the FPI is committed to protecting the public interest by guiding practitioners in the sector towards higher technical and ethical standards. We do this by offering them a broad portfolio of services and support to achieve this, including membership, designations, continuing professional development, thought-leadership and the maintenance of a benchmark Code of Ethics.

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Member of:



FOREWORD

The Financial Planning Institute (FPI) is the premier independent professional body in the financial services sector with over 30 years of service in being the forerunner in setting financial planning standards and representing professional Financial Planners in South Africa.

The FPI currently has approximately 7 000 members and is affiliated to the Financial Planning Standards Board (FPSB), the Ethics Institute of South Africa and to Business Unity South Africa (BUSA). The FPI is also involved in a number of work streams of the Financial Services Board (FSB).

The role of the financial planner particularly in the highly regulated healthcare environment has changed substantially. The financial planner is in a position where they are the trusted friend and advisor on tax, investments, financial planning and personal wellness.

The FPI members are highly skilled individuals who are proficient in employer, employee and trade union engagement related to a number of human resources matters. This positions the financial planner as an expert in risk assessments as well as communicator of the impact of the various risks and product solutions.

The advice, guidance, training and communication of NHI and other healthcare solutions should be no different. The focus has been placed on what the planner/advisor earns for services but the focus has not been on what the planner/advisor does and is required to deliver in the face of various pieces of legislation. According to the Council for Medical Schemes R1.3 billion was paid to independent advisors for the year. This equates to 2.44 million (average of R44.4 per member) members represented by advisors. This is an indication of how well financial advisors are positioned within the healthcare sector to add continuous value.

FPI as an organisation can equip people who will be employed in NHI management and employee structures to understand the complex healthcare and financial environment they will be operating in. The FPI upholds high levels of standards as well as focussing on the code of conduct necessary in the regulatory frameworks.

Information, training material as well as exams, where necessary, are readily available through the use of technology through the FPI, giving people easy access throughout the country.

Mr Andre Jacobs (Chairperson of the FPI Health Committee & NHI Working Group)

and

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FPI VIEW AS SUBMITTED TO BUSA:

The Financial Planning Institute (FPI) welcomes the opportunity to comment on the National Health Amendment Bill.

The FPI, as a member of BUSA, fully supports the BUSA submission regarding the National Health Amendment Bill in as far as they have commented and incorporated the FPI commentary submitted through to them, as per the below. We do not wish to add any additional commentary.

For ease of reference we have again attached the BUSA submission immediately below.

We thank you for the opportunity to provide our comments.

FPI COMMENTARY MADE TO BUSA:

“BUSA welcomes the opportunity to comment on the National Health Bill. The amendments proposed in the National Health Bill are supported on the basis that it establishes the Office of Health Standards Compliance (OHSC) and the office of a health Ombud. These additions to the National Health Bill as proposed is in line with the 10-point health plan government embarked on. The additions will lay the foundation to improve healthcare delivery and protect consumers of health care.

The transformation of the healthcare system in South Africa can be a catalyst for social cohesion in a similar fashion as in Mexico. This will require the involvement of all stakeholders to in concert with societies needs co-design and manage a transformed quality and affordable healthcare system that is responsive to the needs of all citizens. BUSA believes that if the expertise of business, Organised Labour and Civil Society should be leveraged to ensure that adequate governance and checks and balances are established to enhance the accountability of the OHSC and the Ombud. BUSA therefore suggest that the following amendments are considered in terms of the National Health Amendment Bill.

- **Appointment of the CEO of the OHSC:** Amend proposed section 79A (1) to read as follows: “ The Minister must, after consultation with NEDLAC, subject to the laws governing the public service, appoint a fit and proper and suitably qualified South African citizen as the Chief Executive Officer of the Office” (Underline is the suggested insertion by BUSA)
- **Appointment of the Ombud:** Amend proposed section 81 (1) to read as follows: “ The Minister must, after consultation with NEDLAC, appoint a fit and proper and suitably qualified South African citizen as Ombud” (Underlined is the suggested insertion by BUSA)
- **Functions of the Ombud:** Amend proposed section 81A to add an additional sub section to read as follows: “The Ombud to consult where appropriate and desirable with the Consumer Commissioner” (Underline is the suggested insertion by BUSA)

FPI or FPI through BUSA is prepared to make oral representations to the portfolio committee of Health should we be required to do so.
