



MALTA HEALTH NETWORK
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Malta Health Network (MHN) Submission National Patient Safety Strategy 2025–2035

Introduction

The Malta Health Network (MHN) welcomes the opportunity to contribute to the development of Malta's first National Patient Safety Strategy. We recognise the urgency and significance of this initiative, which aims to enhance patient safety across both public and private healthcare services.

To inform this submission, MHN solicited feedback from its members via email, receiving written input from two entities. Additionally, a consultation meeting was held on Tuesday, 30th September at the Malta Life Sciences Park, attended by around 30 people, representing none-less than 15 different organisations members in MHN.

We commend the six commitments outlined in the draft strategy and strongly support **Strategic Objective 5: *Engage and empower patients and communities***. MHN believes this principle should be foundational to all aspects of the National Patient safety Strategy.

We urge that the strategy, its action plans, and evaluation mechanisms comprehensively address **all levels of care**—from health promotion and disease prevention to tertiary and end-of-life care—across both public and private sectors, including facilities in Gozo.

MHN Recommendations

1. Patient Well-being as a Cornerstone of Safety

Patient safety must be understood holistically. Emotional, psychological, and social well-being directly influence treatment outcomes, cooperation, and satisfaction. A truly safe system must promote dignity, comfort, and trust throughout the care journey.

2. Workforce Conditions and Safety Culture

Workforce well-being is inseparable from patient safety. MHN calls for alignment with OHSa and EU directives, especially the Working Time Directive. Long hours and poor conditions undermine morale, retention, and care quality.

MHN recommends:

- Mandatory limits on working hours, especially for junior staff
- A no-blame culture for reporting workplace concerns
- CPD focused on patient safety and self-care
- Safety culture embedded in academic training across all levels

3. Psychological Support for Healthcare Workers

The emotional toll on healthcare professionals must be addressed. MHN urges the establishment of accessible, stigma-free psychological support services, backed by adequate resources. A resilient workforce is essential for safe care.

4. Addressing Language and Cultural Barriers

Miscommunication due to language or cultural differences can compromise safety. MHN urges urgent targeted and ongoing training and adaptation programs, including modules on patient safety and cultural competence, as outlined in the National Health Workforce Strategy.

5. Empowering Patients and Families

Shared decision-making (SDM) is a cornerstone of patient-centred care. It improves understanding, trust, adherence, and outcomes.

MHN advocates for:

- Active patient involvement in care and SDM
- Protected time during consultations
- Inclusion of relatives/significant others in specific cases (e.g. dementia)
- Recognition of patient NGOs as policy contributors
- Co-design of services and safety protocols with patient representatives, formal and informal Support groups and NGOs operating in the sector. MHN can help as a focus

point to get to the specific group if necessary or represent patients if that particular area is not served by an NGO.

6. Navigator Nurses

Navigator nurses play a vital role in guiding patients through complex care pathways. In Malta, their integration into the national cancer strategy has shown measurable impact.

MHN recommends:

- Expanding navigator nurse roles to chronic pain, rare diseases, and other complex conditions
- Prioritising transitions of care to reduce medication errors and emotional distress

7. Enforcing the National Patient Charter

The National Patient Charter must be legally enforceable. MHN calls for a revision of the National Patient Charter and then it is strengthened with proper channels of redress and legislative action to embed its principles into law, ensuring patients' rights are upheld across all settings.

8. Access to Medicines

Medication errors are a major threat to patient safety. MHN raises concerns about:

- Use of generics without clear guidance and education to patients as to where they should report any adverse reactions etc.
- Dispensing without English-language patient information leaflets (PILs) and labelling in clear breach of national and EU legislation
- Errors during transitions of care
- Out-of-stock medicines disrupting treatment
- Insufficient regulation of supplements and medical devices - A recent case involving *Folidi*, a locally marketed supplement with dangerously high vitamin D levels, highlights the urgent need for stronger oversight.

9. Inclusive Governance Structures

Governance frameworks must enable meaningful patient involvement. The Malta Health Network (MHN) supports the development of a national health literacy strategy and

advocates for the active inclusion of patient groups and NGOs in shaping health governance. Health-related committees—such as those responsible for Health Technology Assessment (HTA) reviews, technical compliance evaluations, tender adjudication, boards of investigation, and appeals boards—should include an elected patient representative. Such inclusion brings valuable patient experience and expertise to the decision-making process and significantly enhances transparency.

10. Recognition of Patient Groups as Stakeholders

The Malta Health Network (MHN) is concerned that the draft strategy has excluded patient groups and NGOs from its development phase. Their involvement must extend beyond the initial drafting to include the formulation of action and evaluation plans, implementation, and post-implementation review.

MHN strongly asserts:

- Patient and civil society engagement must be embedded from the outset
- NGOs should be recognised as strategic partners in shaping and delivering the strategy
- We should not only be invited to attend and contribute to such an important document when it is practically at the final stages as a tick box exercise

11. Leveraging Patient-Led Research and Education

The National Health System Strategy's emphasis on research presents an opportunity to integrate patient-led initiatives.

MHN recommends:

- Regular collection and analysis of patient safety indicators
- Use of patient experience surveys and storytelling
- Education campaigns led by patient groups, supported by health authorities

12. Annual Safety Assessments

MHN proposes annual assessments of patient safety using both routine and bespoke data. Findings should be published transparently and co-reviewed with patient groups to inform corrective actions.

13. Monitoring and Evaluation Framework

A structured Monitoring and Evaluation Framework embedded in the National Patient safety Strategy is essential for accountability. MHN recommends that patient groups and NGOs be formally included in the teams responsible for tracking progress and ensuring transparency.

Conclusion

The Malta Health Network (MHN) remains firmly committed to supporting the development and execution of a strategy that genuinely reflects the needs, voices, and rights of patients. We welcome continued collaboration and dialogue with all stakeholders.

Moreover, MHN emphasizes that the National Patient Safety Strategy must not remain a statement of intent—it must serve as a driver for immediate and sustained implementation.

About Malta Health Network

The Malta Health Network (MHN) is a coalition of health-related organisations. Established in 2007 with 17 member groups, MHN now represents over 40 organisations, reaching more than 12,000 families by 2023.

MHN's central mission is to amplify patients' voices in health matters both locally and internationally. Its objectives include patient empowerment, advocacy, and training, while providing a platform for networking and shared resource initiatives among its members. Affiliated with multiple European and international organisations, MHN enjoys a respected standing locally and across these networks. The organisation actively participates in a variety of projects and partnerships focused on patient empowerment, education, and advocacy.

MHN champions patients' and community health interests, staying abreast of global best practices and capacity-building efforts. This is achieved through ongoing interaction with governmental, non-governmental, not-for-profit, and patient representative groups at both local and international levels. Since its launch, MHN has initiated numerous projects aimed at enhancing healthcare in Malta.

Member organisations include:

1. Action for Breast Cancer Foundation
2. ADHD Family Support Group
3. Amputees for Amputees Association
4. Arthritis and Rheumatism Association in Malta
5. Association of Medical Representatives
6. Association of Speech Language Pathologists
7. Association of Private Family Doctors
8. Association of Podiatrists Malta
9. Beating Hearts Malta
10. Breast Care Support Group Europa Donna Malta
11. Caritas Malta Epilepsy Association
12. Coeliac Association Malta
13. Friends of Mount Carmel Hospital Society
14. Friends of the Sick & Elderly in Gozo
15. Fondazzjoni Nanniet Malta
16. GS1
17. Genetic and Genomic Counselling Association Malta
18. Home Economists in Action
19. Hospice Malta
20. Karl Vella Foundation
- 21.. Malta Association of Crohn's and Colitis
- 22 Malta Association of Occupational Therapists
23. Malta Association of Physiotherapists
24. Malta Association of Public Health Medicine
25. Malta Breathe Well Association
26. Malta Chamber of Pharmacists
27. Malta Cochlear Implant Association
28. Malta Colorectal Cancer Awerness Group
29. Malta Dementia Society
30. Malta Diabetes Association
31. Malta Eczema Society
32. Malta Heart Foundation
33. Malta Medical Students Association
34. Malta Obesity Association

35. Mental Health Association Gozo
36. Mental Health Association Malta
37. Multiple Sclerosis Society Malta
38. National Association of Pensioners
39. National Alliance for Rare Disease Support Malta
40. Revive Foundation
41. Richmond Foundation
42. St. Jeanne Antide Foundation
43. SOS Malta
44. Transplant Support Group (Malta)