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### **OCANZ response to Consultation Paper on Issues Supplementary to the IGA**

On behalf of OCANZ, thank you for the opportunity to comment on the consultation paper. OCANZ remains supportive a national registration and accreditation scheme for the health professions. There are several matters however that appear to require further consideration.

#### **Financial provisions – fee setting powers**

OCANZ is very concerned about the funding of the scheme, in particular the proposal that the Agency Management Committee and the National Boards be required to reach agreement on fees.

OCANZ is strongly of the view that in order to carry out its statutory responsibilities and to regulate its own proceedings (as stated in 5.2) a National Board ought to control its own finances. OCANZ's experience with the NSW Health Administration Corporation has demonstrated that, without real financial control, a registration board can be hamstrung in carrying out its statutory role. We would be happy to provide evidence in support of this.

#### **Indemnity provisions**

Certainly there should be protection from personal liability for those involved in the new scheme. However, the requirement that a person's actions must be reasonable in order to be indemnified may be a disincentive to prospective board members if it means they might be liable for legal costs associated with establishing first that their actions were reasonable. For that reason, we suggest removal of '...and reasonably'.

#### **Structure of the new scheme**

The proposed structure of the new scheme sees National Committees carrying out the accreditation role. A structure under which accreditation is performed by a committee of a national board could be construed as lacking the independence that is fundamental to the accreditation assessment process. It also does not appear to take into account that accreditation is usually performed by a separate corporate entity.

We understand that more work is being done on the relationship between the national boards and the existing accreditation bodies and we look forward to contributing to the consultation paper on accreditation arrangements.

Yours sincerely

DARYL GUEST  
Chair, OCANZ

cc. Forum of Australian Health Professions Councils