



**RURAL DOCTORS  
ASSOCIATION  
OF AUSTRALIA**  
*Caring for the Country*

Health Workforce Principal Committee  
Australian Health Ministers' Advisory Council  
PO Box 2089,  
WODEN ACT 2606  
Attention: Practitioner Regulation Subcommittee

(via email: nraip@dhs.vic.gov.au)

12 September 2008

### **National Registration and Accreditation, September 2008**

The Rural Doctors Association of Australia (RDAA) supports the introduction of national registration arrangements for medical practitioners so that uniform quality standards are in place and that doctors are able to work anywhere in Australia without having to go through the onerous process of getting individual state registrations.

The RDAA has quite a few members who work in different states either through living close to a state border or undertaking rural locums, these doctors have found it to be more than just a nuisance to maintain several registrations and the new scheme is welcome. We also expect that recruitment of rural locums will also become easier as there will no longer be the delays and costly overheads associated with multiple registrations.

We note that some medical organisations have raised some concerns regarding the processes for accreditation and we understand a further process of consultation is to be undertaken. The RDAA believes that to date insufficient detail has been released particularly in relation to accreditation process and the roles of the Ministerial council and the boards.

The RDAA believes that in order to maintain the confidence of the public and the professions that it is essential that the accreditation process be independent of the potential for political interference and that a fully transparent process be put in place. We remain to be convinced that this is the case.

I have also below provided some comments in relation to the *Consultation Paper on Issues Supplementary to the Intergovernmental Agreement on a National Registration and Accreditation Scheme for the health professions to be included in the first bill*:

- **Sec 2.1 - Interventions by the Ministerial Council should be transparent.** The RDAA considers it essential that all decisions including reasons for decisions by the Ministerial Council be published in a timely manner.
- **Sec 3.5 - Resignation and removal** – Agree
- **Sec 3.6 Coverage for legal liability – indemnities and immunities** - agree
- **Sec 3.8 Reporting requirements** – Agree

- **Sec 4.2 Agency Terms of office – length of appointments, sitting fees and allowances** - Agree that three years terms are appropriate and that after their initial appointment members be eligible for one further term
- **Sec 4.6 - Coverage for legal liability – indemnities and immunities** - Agree
- **Sec 4.9 - Staffing arrangements – capacity to employ, set terms and conditions** - Agree
- **Sec 4.10 - Agency funds and fee setting** – Agree and note that the fee setting process should be a transparent and that any fees above the inflation rate should be justified and available to the professions for scrutiny.
- **Sec 4.12 - Reporting requirements for agency** – if board reports are consolidated into a single agency report then this should be for convenience rather than the truncation of any individual board report.
- **Sec 5.1 - Names of boards** – Agree
- **Sec 5.3- Board Sitting fees and allowances, and length of appointment** -Agree that three years terms are appropriate and that after their initial appointment members be eligible for one further term. Agree that fee and allowances should be set by the Ministerial Council having regard to the incomes that are forgone by the professionals sitting on the boards.
- **Sec 5.6 Resignation and removal** – Agree
- **Sec 5.7 Coverage for legal liability - indemnities and immunities** – Agree
- **Sec 5.8 Reporting requirements** – Agree
- **Sec 5.11 - Responsibility for developing accreditation standards (accreditation committee or bodies)** – will the boards have any role in relation to accreditation, for example who will provide the ministerial council with advice in relation to the appropriate body to develop the accreditation standards?

If you require any further information please feel free to contact me on 02 627839303 or email [ceo@rdaa.com.au](mailto:ceo@rdaa.com.au).



**Steve Sant**  
**Chief Executive Officer**



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