

Ms Bronwyn Nardi
Chair
Practitioner Regulation Sub-Committee
Health Workforce Principals Committee
NRAIP@dhs.vic.gov.au

15 December 2008

Dear Ms Nardi,

Re: Proposed information and privacy sharing arrangements under the national registration and accreditation system

The Australian Medical Students' Association (AMSA), the peak representative body for Australian medical students, is supportive of student registration under the proposed national registration and accreditation scheme. The manner in which we believe student registrants' information should be handled is outlined below.

Information to be collected

The information to be collected by the national medical board, as outlined in the consultation paper on information sharing and privacy, is satisfactory.

AMSA supports conducting criminal record checks for all registrants on application for board registration provided this does not constitute a significant financial burden for student registrants.

With respect to collection of employer information, we suggest that in place of employer information or location of practice, details of students' university enrollment is collected. Students frequently undertake clinical training at a number of different locations making it impractical to keep location of practice conditions up to date with the board.

Information available on the public register

The information to be made available on the public register, as outlined in the consultation paper on information sharing and privacy, is satisfactory, with the exception of postcode of personal place of residence. AMSA strongly opposes making any details about student registrants' personal addresses available on the public register. There is little to be gained from making a registrants' postcode of personal place of residence available to the public. In contrast there is a potential risk to a student's safety and privacy by making their postcode available on the public register, particularly if they live in a small community or on a university campus, the latter of which often have unique postcodes.

AMSA is strongly supportive of Proposal 4.3.1, that if conditions on practice relate to practitioner health or impairment issues, the public register record that a health condition applies, with no further details appearing on the register.

Information for workforce planning purposes

AMSA supports the voluntary collection of data for workforce planning but does not endorse mandatory collection of workforce data on the grounds that failure to report workforce data could result in a student being deregistered under a mandatory system.

Should workforce data be collected as part of the registration process, the de-identified data should be made publicly available.

Information Sharing with universities

AMSA supports sharing of information relating to changes to a student's registration status and performance and conduct matters with universities. We believe health matters should remain confidential unless: the student registrant gives permission for information about their health status to be shared with their university; or the student's health impairment is likely to be a risk to patient safety.

Any information shared with universities should be communicated to an appropriate university employee who does not participate in conducting or marking student assessments.

Student registrants should be informed whenever information is provided to their university by the board.

Thank you for the opportunity to provide input on this issue.

Yours sincerely

A handwritten signature in black ink, appearing to read 'T J Smith', with a long, sweeping underline.

Timothy Smith
Vice President (External)
Australian Medical Students' Association