

COUNCIL OF OPTOMETRY REGISTRATION AUTHORITIES Inc.

Incorporation No. A0049268P
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15 December 2008

Ms Bronwyn Nardi
Chair
Practitioner Regulation Subcommittee
Health Workforce Principal Committee

Dear Ms Nardi

INFORMATION SHARING AND PRIVACY SUBMISSION

This submission is being furnished on behalf of the Council of Optometry Registration Authorities Inc (CORA).

A summary of responses to the proposals is contained at Appendix A to this submission. However, we would appreciate your consideration of the following additional comments:

3.1.2: QUALIFICATIONS: It is not always necessary for new graduands to provide “transcripts” as universities and colleges, by agreement with the Boards in some cases, provide the Boards with a list of persons who have successfully completed the approved course. This arrangement allows students to lodge applications for registration prior to promulgation of their results and enables Board staff to screen application forms and supporting documentation and take early remedial action if any irregularities are evident. The legislation should therefore be sufficiently flexible to enable Boards to exercise discretion to employ procedures that guarantee the integrity of the verification of qualification process, whilst also streamlining the registration process and eliminating red-tape.

3.8.3: WORKFORCE DATA: There should be no legislative impediment to boards seeking and or obtaining **de-identified** workforce data.

4.1.1: INFORMATION ON PUBLIC REGISTER: Inclusion of postcodes could lead to identification and harassment of health professionals, in particular nurses and psychologists. Protection of the public and registrants is of equal importance. Boards should be able to determine whether the inclusion of relevant jurisdiction (eg ACT, NSW) in lieu of postcode is adequate.

4.3.1: CONDITIONS ON PUBLIC REGISTER: Inadvertently naming and shaming impaired practitioners, whose situation and management are treated by Boards and at places of employment in a confidential manner, is contrary to the spirit of this program. If those registrants fail to adhere to the undertakings they give to the Boards, they will progress down the disciplinary pathway and be dealt with accordingly. The current proposal has the potential to undermine long-term recovery programs (such as mental illness cases).

President
Dr Mark Feltham

Executive Officer
Mr Geoff Leunig

4.5.1: RELEASE OF PUBLIC REGISTER INFORMATION: If the proposal only refers to the release of information on the public register, and the public register is available on line, it begs the question: Why would anyone apply to the Board and pay a fee for information that is readily and freely available ? If there is more to the proposal, it is not clear.

8.1: REPOSITORY OF LAST RESORT: This proposal contains inappropriate cost and logistical problems. The relevant Departments of Health should be the last resort repositories.

CORA appreciates having been given an opportunity to lodge this submission.

Yours faithfully

Mark Feltham
PRESIDENT
CORA Inc

APPENDIX A
TO CORA SUBMISSION
INFORMATION SHARING AND PRIVACY SUBMISSION
15 DECEMBER 2008

PROPOSAL	DESCRIPTOR	COMMENTS
3.1.1	Purpose for collection	Agreed
3.1.2	Key registration information categories	Agreed, but Refer to covering letter also
3.2.1	Power to collect employer details	Option 2 preferred
3.3.1	Unique identifier	Agreed
3.3.2	Information sharing with NEHTA & Medicare	Agreed
3.4.1	Identity checking	Option 1 preferred
3.8.1	Workforce data collection	Agreed
3.8.2	Suspension of current voluntary surveys	Agreed
3.8.3	Boards unable to obtain workforce data	Disagree Refer to covering letter also
3.8.4	Disclosure of workforce data to Ministerial Council	Agreed
3.8.5	Public disclosure of de-identified workforce data	Agreed
4.1.1	Information on Public Register	Agreed, but Refer to covering letter also
4.2.1	Recording de-registered practitioners	Option 4 preferred
4.3.1	Recording conditions on Public Register	Agreed, but Refer to covering letter also
4.5.1	Release of information on the register	Agreed, but Refer to covering letter also
4.6.1	Publication of Tribunal decisions	Agreed
4.6.2	Publication of Committee decisions	Option 2 preferred
5.1.1	Private Sector Privacy legislation	Agreed
5.2.1	Incorporation of C'th provisions by reference	Agreed
7.1.1	Restricting unique identifier	Agreed

7.2.1	Releasing de-identified information	Agreed
7.3.1	Release of information to PSR	Agreed
7.4.1	Release of information to Medicare	Agreed
7.5.1	Release of information to DIAC	Agreed
7.7.1	Release of information to government bodies	Agreed
7.8.1	Notifications to Health Departments	Agreed
7.12.1	Information sharing with NZ	Agreed
7.13.1	Information exchange with international registration bodies	Agreed
8.1	Repository of last resort	Disagree Refer to covering letter also