

3 October 2008

Practitioner Regulation Subcommittee
Australian Health Ministers' Advisory Council
e-mail: NRAIP@dhs.vic.gov.au



SUBMISSION ON PARTIALLY REGULATED PROFESSIONS

The Australian General Practice Network appreciates the opportunity to comment on the proposed national regulation of nine health occupations currently regulated in the states and territories. In addition, our submission welcomes other partially regulated health occupations for inclusion in a single national scheme.

It is important for GPs that referrals to their allied health colleagues are made in the confidence that patients will receive professional care and service. A national scheme encompassing both registration and accreditation will afford GPs greater confidence when referring patients to other occupations in the health matrix.

Nine occupations to be regulated under the National Registration and Accreditation Scheme

We welcome a centralised scheme for the registration and accreditation of nursing and midwifery, medicine, physiotherapy, psychology, optometry, chiropractic care, dental care (including dentists, dental hygienists, dental therapists and dental prosthetists), osteopathy and pharmacy.

Importantly these occupations are already subject to statutory registration requirements in each practitioner's respective state or territory. As such, many of the patient-orientated advantages, including legal and ethical issues have already been canvassed during the creation and reviews of the various state based registration regimes. Amongst the GP community the advantages of registration and accreditation are well known to improve outcomes in patient care.

We also appreciate that a national scheme is more dynamic than state based regimes at delivering national health outcomes.

Further, a national scheme will provide greater flexibility for members to migrate between states and territories and reduce burdensome multiple registration requirements.

Including *partially* regulated health occupations in a single national scheme.

It is important for GPs that, referrals to their allied-health colleagues are made in the confidence that patients will receive professional care and service. A national scheme can afford GPs greater confidence in the competency of other occupations when referring patients.

Australian General Practice Network Limited

25 National Circuit Forrest ACT 2603 | PO Box 4308 Manuka ACT 2603
T 02 6228 0800 | F 02 6228 0899 | www.agpn.com.au | ABN 95 082 812 146

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Professional regulation serves to improve practitioner education, to set occupational standards, monitor competence and improve performance management. It has the potential to improve not just patient safety, but also the safety, knowledge and professionalism of the health practitioner.

As such, the following partially regulated health occupations should also be included the national scheme:

- Aboriginal and Torres Strait Islander health workers;
- Dental Technicians;
- Occupational therapists;
- Medical radiation practitioners (diagnostic radiographers, radiation therapists, nuclear medicine technologists and nuclear medicine scientists);
- Speech pathologists;
- Chinese medicine practitioners; and
- Optical dispensers.

We welcome moves to regulate these additional health and allied health occupations in the National Registration and Accreditation Scheme. We also recommend including podiatry, social work and dietetics in the scheme as soon as is practicable.

Uniform Legislation and Regulations

One area you may further wish to examine is the implementation process to the national scheme. Our preference is, where possible, for uniform and identical legislation in each jurisdiction as opposed to mere enabling legislation to create the national scheme but which unnecessarily differs in terminology, disclosure and other related obligations.

Clause 6.4 of the Intergovernmental Agreement requires each jurisdiction to enact corresponding legislation to be *substantially* similar to the agreed model. That process needs to be closely monitored to ensure that any departure from the agreed model is absolutely *necessary* to achieve legal certainty to the jurisdiction.

The proposed scheme should aim to avoid any uncertainty in the minds of the registered members. A practitioner from one state or territory should not misunderstand their legal responsibilities when operating in another jurisdiction.

The Australian General Practice Network appreciates the opportunity to make a constructive submission to the Practitioner Regulation Subcommittee. And, we welcome the proposal to create a National Registration and Accreditation Scheme for Health Professionals.

Yours sincerely



Liesel Wett
Acting Chief Executive Officer

