



***SUBMISSION OF THE HEALTH SERVICES COMMISSIONER,
VICTORIA, TO THE NATIONAL REGISTRATION AND ACCREDITATION
SCHEME FOR THE HEALTH PROFESSIONS CONSULTATION PAPER:
PROPOSED ARRANGEMENTS FOR ACCREDITATION***

DATE: 17 December 2008

Thank you for the opportunity of commenting on this Consultation Paper. National registration is an important initiative in promoting harmonisation throughout Australia. It is an opportunity for genuine cooperative federalism rather than Federal domination.

The Health Services Commissioner (HSC) supports most of the proposals put forward in the Consultation Paper. Robust accreditation processes are obviously in the public interest. The HSC's understanding of the Australian Medical Council (AMC) accreditation processes are that they are transparent, robust, well developed, publicly accountable and appropriate consultation takes place. The AMC, of course, deals only with medical practitioners and there will be significant challenges for some of the other Boards in developing accreditation processes and governance. The HSC recommends the other Boards take a very close look at the AMC's processes and consultations with a view to adopting a similar model. The HSC notes the Paper recommends accreditation agencies consult with the Boards but this should be made stronger to read something like "take account of" or "have regard to."

The HSC also supports the proposals regarding delegation of powers and sub-delegation of powers. The HSC recommends the Health Issues Centre and the Consumer Health Forum be consulted to provide guidance on how the governing body of external or accrediting bodies can best utilise community input into the governance arrangements.

The HSC makes no further comment on this particular part of the consultation process except to say I am confident the Practitioner Regulation Subcommittee and the Health Workforce Principal Committee will take account of the special needs of some of the Boards and recognise the need to support them through this process.