

**NATIONAL REGISTRATION AND ACCREDITATION SCHEME  
FOR THE HEALTH PROFESSIONS**

**ACT Optometrists Registration Board response to**

**CONSULTATION PAPER**

**Handling complaints and dealing with performance, health and conduct  
matters**

## CONTENTS

### 1. Background

Proposal	Support	Reason for disagreement
1.5.1 Principles	yes	

### 2. Proposed terminology

Proposal	Support	Reason for disagreement
2.1.1	Notification and notifier	
2.1.2	Preliminary assessment	
2.1.3	Notification assessment committee	
2.1.4	Proposed term responsible HCC	
2.1.5		In smaller Territories these committees could be stretching resources
2.1.6	However, we prefer the term competence rather than performance	
2.1.7		Again prefer “Competency panel”
2.1.8		In smaller Territories these committees could be stretching resources
2.1.9	yes	
2.1.10	health assessment panel	
2.1.11		In smaller Territories these committees could be stretching resources
2.1.12		It is suggested that this is determined in conjunction with the Human Rights Commissioner
2.1.13	yes	
2.1.14	yes	
2.1.15	Not of good character	
2.1.16	yes	
2.1.17	yes	
2.1.18	yes	
2.1.19	yes	

### 3. Overview of proposed system

Proposal	Support	Reason for disagreement
3.3.1	yes	

#### 4. Notifications

Proposal	Support	Reason for disagreement
4.1.1	Yes	
4.2.1	Yes, However, in extreme circumstances, the Health Minister could accept a verbal and nor written submission.	
4.2.1	yes	
4.3.1	yes	
4.4	Option 1b and 2b	
4.5.1	yes	
4.6.1	yes	
4.7.1		Suggests an initial 3 months suspension
4.7.2	yes	
4.7.3	yes	

#### 5. Preliminary assessment of notifications

Proposal	Support	Reason for disagreement
5.1.1	yes	
5.2.1	yes	
5.3.1	Yes, however, the HCC should be linked in the Human Rights Commissioner.	
5.4.1	Yes, however, in smaller Territories this committee could be stretching resources	
5.5.1	We have reservations	We would like to know what is involved with the preliminary assessment.
5.5.2	Yes, provided investigations in the preliminary assessment stage are carried out correctly.	
5.5.3	yes	
5.6	Option 2	

**6. Performance matters**

<b>Proposal</b>	<b>Support</b>	<b>Reason for disagreement</b>
6.1.1	yes	
6.2.1	Yes, however the performance management committee should have clear guideline based on published professional standards	
6.2.2	yes	
6.3.1	yes	
6.3.2	Yes, however under exceptional circumstances a report as close to 7 days as possible may be the best option.	
6.3.3	yes	
6.4.1	Yes, however, performance management is to be performed after a through investigation of poor performance in question.	
6.5.1	yes however, performance management is to be performed after a through investigation of poor performance in question.	
6.5.2	Yes, as above	
6.5.3	yes	

**7. Health or impairment matters**

<b>Proposal</b>	<b>Support</b>	<b>Reason for disagreement</b>
7.1.1	yes	
7.1.2	Option 2	
7.2.1	yes	

**8. Conduct matters**

Proposal	Support	Reason for disagreement
8.1.1	yes	
8.2.1	yes	
8.2.2	yes	
8.3.1	yes	
8.3.2	yes	
8.3.3	yes	
8.3.4	yes	
8.3.5	yes	
8.4.1	yes	
8.4.2	yes	
8.5.1	yes	
8.6.1	yes	
8.6.2	yes	

**9. Ensuring accountability, transparency and procedural fairness**

Proposal	Support	Reason for disagreement
9.1.1	Supports option 1, however, can see merit in option 2	
9.1.2	yes	
9.2.1	yes	
9.3	Option 4b	
9.4.1	yes	
9.5.1	yes	
9.6.1	yes	
9.7.1	yes	
9.8	Option 1	

**10. Tribunal hearings**

Proposal	Support	Reason for disagreement
10.1.1	yes	
10.2.2	yes	
10.3.1	yes	
10.4.1	yes	
10.4.2	yes	

Proposal	Support	Reason for disagreement
10.5.1	yes	
10.5.2	yes	
10.5.3	yes	
10.5.4	yes	
10.5.5	yes	
10.6.1	yes	
10.7.1	yes	
10.8.1	yes	
10.9.1	yes	
10.10.1	yes	
10.11.1	Yes, however this should be within a reasonable time frame.	
10.12.1	yes	

#### 11. *Offences and regulated conduct*

Proposal	Support	Reason for disagreement
11.3.1	yes	
11.4.1	Yes, however the board does not support orthoptists having unsupervised/unconditional prescribing rights within the present framework.	
11.5.1	yes	
11.6.1	Option 3	
11.7.1	yes	
11.8.1	yes	
11.8.3	yes	
11.9.1	yes	
11.10.1	yes	

**12. Transition arrangements**

<b>Proposal</b>	<b>Support</b>	<b>Reason for disagreement</b>
12.1.1	yes	