

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

**PROPOSED HANDLING COMPLAINTS ETC
ARRANGEMENTS**

**CONSULTATION PAPER
DATED 19 SEPTEMBER 2008**

**ISSUED BY THE PRACTITIONER REGULATION SUBCOMMITTEE
HEALTH WORKFORCE PRINCIPAL COMMITTEE
AUSTRALIAN HEALTH MINISTERS' ADVISORY COUNCIL**

**COMMENTS BY THE
OPTOMETRISTS REGISTRATION BOARD of VICTORIA
OCTOBER 2008**

FOR SUBMISSION TO NRAIP BY 29 OCTOBER 2008

PROPOSAL	DESCRIPTOR	COMMENTS
2.1.15	Character	Alternative Supported
4.4	Mandatory reporting	Support Options 1b & 2b Students – limited to behaviour rather than professional issue
4.7	Immediate suspension	3 months- possibly insufficient
5.6	Notifier’s rights	Option 2 Supported
7.1.2	Health programs	Option 2 Supported
9.1.1	Separation of functions	Strongly support Option 1
9.3	Legal representation at panel hearings	Option 4b Supported
9.8	Ombudsman	Option 1 Supported
10.6	Constituting hearing panels”	Supported with at least one non practitioner
11.6.1	Regulating advertising	Option 3 supported

No issues with any other of the proposals