

NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR THE HEALTH PROFESSIONS CONSULTATION PAPER

Comment provided by Curtin University of Technology

Proposed Registration Arrangements

These comments relate to section 7.4 of the consultation paper on proposed registration arrangements for the registered health professions: Student registration.

General

The University does not support proposal 7.4.1 that students in courses of study leading to possible entry of a registered health profession be registered before they undertake clinical practice. Extending current student registration requirements to apply nationally would increase the administrative and financial burden on registration boards, students and Universities with no clear public benefit.

Universities operate under strict accreditation guidelines for each of the health professions. These accreditation guidelines provide the mechanism for ensuring students are appropriately prepared to undertake clinical training as part of their course, that clinical experiences undertaken as part of their course are appropriate and conducted under appropriate supervision. Prior to students completing the educational requirements for a profession, they are not qualified and should not be identified as such. Universities currently operate with provisions for excluding students from clinical placement if there is a danger to the public. These provisions protect the public whilst students are undergoing their education.

Comments on specific options

Option 3: The legislation include powers for all boards to register and regulate students, and student registration be mandatory for students in all regulated professions, at the point of enrolment and for the duration of their course.

Option 3 would be unacceptable for the University. If all students in a course of study which may lead to entry to a registered health profession were required to be registered at the point of entry, approximately 1200 students from this University alone would need to apply for and be granted student registration in the two week period in January between being offered a place in a course and the student being enrolled in the course. It is not feasible for registration boards to process the required volume of applications in a timely manner. At a point in a young person's life when they are making decisions about their future, and possibly choosing between different courses, any unnecessary cost or impediment may be a disincentive to students to enrol in a course leading to entry into a registered health profession. This may result in fewer graduates in these professions in the future.

It is also the case that students who enter a course may leave that course due to failure of course requirements, a change of course or leaving study due to work, family or other commitments. In addition, graduates of courses of study in health disciplines may choose not to become practising health professionals, but to apply

their extensive skills in other areas of work. It is unnecessary for students who will not, or may not, work as a registered health professional to be required to be registered until they are ready to seek entry to the profession.

Option 1: The legislation includes powers to register and regulate students, but only for specified professions and boards, for example, the medical and dental professions.

There is no obvious rationale why certain professions would be included or excluded from a requirement for student registration. It is not clear that a student dental hygienist, for example, would be a greater or lesser risk than a student nurse or pharmacist. Any discrimination between students in different professions should be based on evidence, or a defensible risk analysis.

Option 2: The legislation include powers for all boards to register and regulate students, and student registration be mandatory, but only for those students who are undertaking clinical training, that is, those who are at the point in their course where they are in direct contact with patients.

As stated under the general comments, the university does not support registration of students undertaking clinical placement. It believes that current accreditation requirements for the health professions provide ample protection of the public interest. If students were to be required to be registered only during their clinical training, then this would mean students who take a leave of absence during their training to de-register when not undergoing clinical training and re-register before re-commencing training. This would be extremely difficult to monitor for Universities and the registration boards.

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On behalf of Curtin University of Technology