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PRO VICE-CHANCELLOR
HEALTH**



Tuesday 28 October 2008

Ms Bronwyn Nardi
Chair
Practitioner Regulation Subcommittee
Health Workforce Principal Committee
Australian Minister's Advisory Council

Dear Ms Nardi,

Thank you for this opportunity to comment. The University of Newcastle is a strong supporter of the move to a national system for accreditation and registration.

Please find below some comments addressing specific sections of the Consultation Paper.

Proposal 2.1

The Faculty of Health strongly endorses the philosophy expressed in Proposal 2.1, especially the need to implement a system which encourages best practice rather than ease of implementation or which caters to the needs or interests of specific states or territories.

Proposal 4.3.1

Option 4 would seem the most viable, at least in relation to new graduates seeking initial registration, as a system of rigorous criminal record checking is already in place as part of memoranda of understanding between Universities and Area Health services throughout the country. To add an additional layer to these already existing arrangements would be 'overkill'.

Proposal 6.1.1.d

This should only apply to students who have not already undertaken practice based competency testing (which for many professional practise degrees is integrated throughout the program and is required for registration).

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Proposal 6.2.1

While there is no dispute with the inclusion of community and other non-registrant members on the board, there is concern that the current proposal would allow for the majority of board members to be non-registrants. The issue of lack of familiarity with clinical standards and the possible lowering of these standards resulting from lack of professional and clinical knowledge, is a major concern. It also impacts on the issue of continuing professional development.

Proposal 7.4.1

Strong support is given to either Option 2 or 3, especially for professions for which this has not been available up until now (e.g. nursing).

Proposal 9.3.1

The annual reporting obligations as outlined in this proposal could become onerous.

Sufficient Prior Warning of Changes to the Requirements For Registration

Strong support should be given to the proposition outlined that students who are undertaking a program of study leading to registration in one of the related professions at the time of the commencement of the new system ought to be permitted to complete their studies and register according to the requirements at the time they commenced their studies.

It is recognised that this is intended only to cover the transition from the old to the new system. However, it would be useful if this could be extended into a more general principle given problems that have occurred in the past with registration requirements being changed at such short notice that Universities and especially students are placed under great stress. The principle could be that except under exceptional circumstances, students ought to be able to seek registration according to the requirements as specified at the time they commenced their studies. If this was not acceptable, that changes in registration requirements ought to have a one year lead in time before implementation to allow both institutions and students to adjust as needed.

Yours sincerely



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