

## ***Submission to the Legal and Constitutional Affairs References Committee***

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***Inquiry into the establishment of a national  
registration system for Australian paramedics to  
improve and ensure patient and community safety***

**Submission from  
The Council of Ambulance Authorities  
January 2016**



## **The Council of Ambulance Authorities**

### ***Providing leadership for the provision of ambulance services***

The Council of Ambulance Authorities (CAA) is the peak body established by its members to collaborate on ambulance matters of national, regional and international importance. The CAA's members comprise the ten public ambulance services of Australia and New Zealand. These are listed below.

The CAA is governed by a Board, consisting of the Chief Executives of each member service, and supported by a Secretariat, headed by the CAA Chief Executive Officer. The collective knowledge and expertise of CAA's members combines to provide advice; explore opportunities for continuous improvement and innovation; and advocate on behalf of the sector to governments and key stakeholders.

The CAA exists to help advance ambulance services so that they are able to further develop superior pre-hospital care and ambulance services to communities across Australasia.

CAA supports the concept of national registration of paramedics under the Australian Health Practitioner Registration Authority (AHPRA) arrangements.

#### **Members of the CAA:**

Ambulance Service of New South Wales  
Ambulance Tasmania  
Ambulance Victoria  
Australian Capital Territory Ambulance Service  
Queensland Ambulance Service  
SA Ambulance Service  
St John Ambulance Australia NT Ambulance Service  
St John Ambulance Australia WA Ambulance Service  
St John New Zealand  
Wellington Free Ambulance NZ

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## **The Inquiry Terms of Reference**

On 20 August 2015, the Senate referred the following matter to the Legal and Constitutional Affairs References Committee (committee) for inquiry and report by the last sitting day in June 2016:

The establishment of a national registration system for Australian paramedics to improve and ensure patient and community safety, with particular reference to:

- a) the role and contribution made by those in the paramedic profession, including the circumstances in which they are required to operate;
- b) the comparative frameworks that exist to regulate the following professions, including training and qualification requirements and continuing professional development:
  - i. paramedics,
  - ii. doctors, and
  - iii. registered nurses;
- c) the comparative duties of paramedics, doctors and registered nurses;
- d) whether a system of accreditation should exist nationally and, if so, whether the Australian Health Practitioners Regulation Agency is an appropriate body to do so;
- e) the viability and appropriateness of a national register to enable national registration for the paramedic profession to support and enable the seamless and unrestricted movement of paramedic officers across the country for employment purposes; and
- f) any other related matters.

## Introduction

The Council of Ambulance Authorities (CAA) welcomes the opportunity to provide the following submission to the Committee regarding the establishment of a national registration system for Australian paramedics.

It is the view of the CAA that it is both logical and important in serving the interests of public safety that paramedics should be included in the National Registration and Accreditation Scheme (NRAS) alongside the other registered health professionals who work in the health system across Australia.

Primarily, the registration of paramedic practitioners will provide a number of important benefits to our patients, the community, and the wider paramedic profession. These benefits include, but are not limited to:

- a national registry of paramedic practitioners;
- protection of the title of 'paramedic' against misuse;
- the mandatory accreditation of paramedic 'entry-to-practise' education programs;
- regulation of the standard of persons deemed 'fit-to-practise' as a paramedic; and
- application of the health professional 'Code of Conduct' obligations to include paramedics.

Importantly, national registration of paramedics will provide strengthened, consistent and increased accountability and transparency for those practicing in this profession and ensure that the public can continue to have high levels of confidence in the qualifications, skills and level of clinical care provided by these highly trained health professionals. In this regard, CAA will continue to contribute to the national paramedic registration agenda with a view to delivering the greatest benefits towards the patients that our member services provide care to and the wider community from this process.

This submission will address each reference point of the Committee's Terms of Reference below.

***The establishment of a national registration system for Australian paramedics to improve and ensure patient and community safety, with particular reference to:***

***a) the role and contribution made by those in the paramedic profession, including the circumstances in which they are required to operate.***

Paramedics engaged by our member services are on the front-line of health care service delivery every day, providing an increasingly sophisticated range of out-of-hospital care to patients in a variety of settings. Paramedics operating across Australia as a part of the broader paramedic profession, undertake significantly complex clinical decision making and interventions in a very diverse range of emergency and primary care settings away from direct clinical supervision.

Over recent decades, the professionalisation of the paramedic role has been positively influenced by a move from post-employment Vocational Education Training (VET) training conducted by State/Territory Ambulance Services, to the university sector, with undergraduate and postgraduate degrees as the general qualification requirement for 'entry to practice'. This is a key step in becoming a professional health workforce.

The environment in which paramedics work is considered high risk for both the practitioner and public. Notably, paramedics currently provide health care with a scope of practice that encompasses a significant number of the thirteen NRAS 'Public Risk Factors' including but not limited to, the requirement to make clinical assessments then provide treatment to patients without other health care professionals present, and the requirement to administer scheduled drugs or substances by injection, often in an emergency response setting which can be complicated by a range of environmental and situational factors. In this regard, it is the view of the CAA that an elevated regulatory governance structure operating nationally across all jurisdictions, as available under the NRAS would provide additional layers of protection, to both the practitioner and the public receiving treatment, and in this respect, would deliver strengthened assurance to paramedic practice being delivered in the public, defence and private sectors.

***The establishment of a national registration system for Australian paramedics to improve and ensure patient and community safety, with particular reference to:***

***b) the comparative frameworks that exist to regulate the following professions, including training and qualification requirements and continuing professional development:***

- i. paramedics,***
- ii. doctors, and***
- iii. registered nurses.***

***c) the comparative duties of paramedics, doctors and registered nurses.***

As provided by the Australian Health Practitioner Regulation Authority (AHPRA), the safety of the public is protected by ensuring that only health practitioners who are suitably trained and qualified to practice in a competent and ethical manner are registered to do so. Paramedics currently operate with a scope of practice that exposes a patient to a greater number of the thirteen NRAS risk factors than 10 of the 14 health professions currently registered under the NRAS, which includes medicine, nursing & midwifery, physiotherapy, pharmacy, podiatry and Chinese medicine.

Paramedics are often required to provide clinical care that is similar to or the same as those performed by a range of other registered health care professionals including nurses and medical practitioners. This includes significantly complex and high risk clinical interventions being provided away from direct clinical supervision (albeit in a very diverse range of emergency and primary care settings), however paramedics are currently not registered as healthcare professionals in any State or Territory in Australia. Notably, this is a different approach to many overseas locations including the United Kingdom, Ireland, Canada and South Africa.

In addition, one of the fundamental roles of the paramedic is to facilitate the distribution of patients within the wider healthcare system where they are often the first point of contact for patients. In this respect, it is submitted that the adoption of broad range of legally enforceable instruments provided by a scheme such as the NRAS (which imposes mandatory requirements upon the paramedic profession such as a National Registry, National Minimum Competency Standards and accreditation requirements and assurance processes) , will further serve to positively improve public

safety, and increase community confidence in the paramedic profession and the broader provision of emergency health care in Australia.

It is further submitted that the national registration of paramedics will serve to compliment training and qualification frameworks used within Australia for other health professionals including medical practitioners and nurses. The statutory registration of paramedics under the NRAS, in a manner similar to that which currently exists for medical practitioners and nurses, would provide further opportunities to leverage health system reform and the development of more flexible models of health care delivery, thereby potentially reducing pressure on the public hospital system and also enabling a minimum and consistent range of professional standards in the emerging private sector paramedic employment markets.

***The establishment of a national registration system for Australian paramedics to improve and ensure patient and community safety, with particular reference to:***

***d) whether a system of accreditation should exist nationally and, if so, whether the Australian Health Practitioners Regulation Agency is an appropriate body to do so.***

As previously noted, it is the view of the CAA that a system of accreditation should exist nationally via the NRAS. In this regard CAA also supports the view that the Australian Health Practitioners Regulation Agency (AHPRA) is the most appropriate body to administer this scheme once paramedics have been included.

Essentially, it is the view of the CAA that a key benefit delivered through a scheme such as the NRAS lies in the wide-spread application across a profession and having consistent minimum compliance standards for practise. The implementation of legally enforceable regulatory instruments which impose mandatory practise requirements onto the profession is considered essential to clinical quality and patient safety to ensure the highest levels of community confidence in paramedics. A nationally standardised model of professional registration such as the NRAS, fundamentally provides an efficient and effective means of assuring the quality of service delivery, which cannot be delivered as elegantly through other less unified systems of regulation.

In this respect it is the submission of CAA that the success of any system of accreditation lies in a uniformed adoption of such regulation, already established via the NRAS. Further, it is submitted that the administration of such a scheme through the AHPRA, in addition to providing the pre-established infrastructure required to administer such a system, also has the potential to deliver further 'downstream' benefits across the broader systems of health care through a reduction in regulatory duplication, the application of uniform standards, accompanied by a corresponding potential enhancement to patient care outcomes nationally.

***The establishment of a national registration system for Australian paramedics to improve and ensure patient and community safety, with particular reference to:***

***e) the viability and appropriateness of a national register to enable national registration for the paramedic profession to support and enable the seamless and unrestricted movement of paramedic officers across the country for employment purposes.***

It is the submission of the CAA that a national register for the paramedic profession, and the corresponding protection offered to the title of 'paramedic' will support and enable the seamless and unrestricted movement of paramedics within Australia for employment purposes.

CAA support the view that the inclusion of paramedics in the NRAS will in fact, reduce regulatory burden thereby allowing greater scope for paramedics to move more easily across the country and various professional sectors for employment purposes as now exists for the fourteen other registered health professions. From a health system perspective, it is proposed that this aspect of the NRAS will also contribute positively towards building a more consistent, flexible, responsive, and sustainable paramedic workforce nationally.

### **Conclusion**

The members of CAA are grateful to the Legal and Constitutional Affairs References Committee for the opportunity to provide a submission to the inquiry into the establishment of a national registration system for Australian paramedics to improve and ensure patient and community safety.

As the Committee would be aware, at the Health COAG (Council of Australian Governments) meeting held on Friday 6 November 2015, it was agreed to further progress the inclusion of paramedics under the NRAS.

From the perspective of CAA, this is an important step towards providing accountability and transparency for the profession, and ensuring that the public can continue to have the highest levels of confidence in the qualifications, skills and clinical care provided by these highly trained health professionals.

The CAA will continue to work closely with the COAG Health Council and its key groups to progress the actions necessary to complete any regulatory changes required to include paramedics in the NRAS as soon as possible, in the interest of all Australians.