

OPTOMETRISTS REGISTRATION BOARD OF TASMANIA

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29 April 2009

The Secretary
Senate Community Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Submission to the Inquiry into the National Registration and Accreditation Scheme for Doctors and Other Health Workers

Prepared by the Optometrists Registration Board of Tasmania

The members of the Optometrists Registration Board of Tasmania while broadly supportive of the underlying objectives adopted by COAG in 2006, are concerned that the current proposals for the structure of a national registration and accreditation scheme contain fundamental flaws which have the potential to impact negatively on the safety of the general public, if not properly addressed.

Despite the obvious complexities of introducing this scheme across ten professions in eight jurisdictions, the date of implementation is still supposed to be 1 July 2010. It is difficult to see how this can realistically be achieved and the safety of the public be assured.

In addressing the Inquiry's terms of reference below, the Board has detailed specific concerns regarding the current proposals for the implementation of the proposed scheme.

- (a) the impact of the scheme on state and territory health services;**
- (b) the impact of the scheme on patient care and safety;**

The Board is concerned at the potential loss of involvement of the optometry profession in regulation in Tasmania. It considers that local representation on the National Optometry Board is unlikely and the opportunity for a State committee to provide a local context to national decisions will be limited by budget constraints, and may prevent a separate Tasmanian committee from operating at all.

It will be unavoidable that profession and area specific issues will arise in Tasmania and it is essential that local professional expertise with experience and knowledge of the registration scheme is available to support the administrative structure in Tasmania. The Board considers that there should be an optometry specific state committee in Tasmania to ensure that the public of Tasmania is adequately protected and receives optometry services of the highest professional standard

The retention of institutional knowledge and experienced staff for the smaller professions is vital. The Board is particularly concerned that the current staffing model proposes that no staff from existing contracted staff in four states will be employed in the new structure. This will result in the complete loss of knowledge and expertise in matters relating to regulation of optometry in Tasmania, Victoria, South Australia and Western Australia. This is an outcome that does not fit with the objective of protection of the public.

The Optometrists Registration Board of Tasmania has been administered by an independent contractor for ten years. The contractor's staff have developed considerable expertise which is likely to be lost under the proposed model, as they seek alternative employment which offers ongoing security.

There is a danger smaller professions such as optometry will be pushed to the sidelines at a state level in a structure that includes the larger professions such as nursing. Profession specific expertise must be available to the public in each jurisdiction through the proposed "one stop shop front".

It is essential that appointments to State office positions are made at a sufficiently senior level that recognises the skills and training necessary to fulfil the role of administering the regulation of the profession and ensuring the protection of the public.

If staff are not senior enough to take on complex issues, such matters will need to be forwarded through a National Office which may delay the process of dealing with matters which have a significant impact on the public.

(c) the effect of the scheme on standards of training and qualification of relevant health professionals;

The Optometrists Registration Board supports:

1. A National Registration scheme which provides mobility of workforce and a central database of registered optometrists,
2. National Standards of Practice,
3. Continuation of and funding for National Accreditation of Optometry schools and examination of overseas applicants for Australian registration. These processes have been successfully undertaken for the past ten years by the Optometry Council of Australia and New Zealand which was established by the existing registration boards.
4. Consistency of legislation between jurisdictions including Poisons legislation.

The Board supports the formal establishment of a national optometry Board which deals with high level policy issues regarding registration and accreditation. Presently an incorporated association of the existing registration boards has the capacity to fulfil this function. This association is represented on the existing accreditation body referred to in 3 above.

(d) how the scheme will affect complaints management and disciplinary processes within particular professional streams;

Under the proposed scheme, complaints will initially be handled locally. The Board is concerned about the general public having sufficient access to people with experience of the optometry profession to handle complaints. The Tasmanian office is likely to be staffed by ex employees of the Nursing Board and Medical Council and given the large numbers of registrants in those professions it is likely that a small profession such as optometry will not be a high priority.

There is to be a central tribunal in Tasmania to handle serious complaints. The model and funding for this tribunal has not yet been clarified and it is unclear as to how complaints will be handled and referred and what profession specific expertise will be accessed.

If there is not a state committee and no staff with experience of the optometry profession in the state office there will be delays in processing complaints as matters will need to be passed up through the national agency.

The current registration scheme is profession funded in Tasmania with each Board a separate statutory body self-funded through the registration fees collected.

The proposed scheme will be a more bureaucratic, more complex and more expensive system likely to increase costs to the taxpayer twice – through the increased cost to the public purse of sustaining the system and through the probability of any increase of registration fee costs being passed on to them when they visit their health care provider.


(e) the appropriate role, if any, in the scheme for state and territory registration boards;

The Optometrists Registration Board of Tasmania considers that the members of existing State and Territory Boards should be included on state panels for an initial period of at least three years. This would ensure the maintenance of high standards and the ongoing provision of local profession specific expertise and knowledge which is in the best interest of the public.

(f) alternative models for implementation of the scheme.

The Board remains of the opinion that the outcomes being sought by COAG could be achieved at significantly less cost, disruption and threat to public safety by the following:

- A national registration data base for each profession which could be administered by an existing state office;
- A formalised National Professional Board for Optometry (as proposed), made up of a representative of each Australian jurisdiction and New Zealand and two persons who are not registered health practitioners;
- Continuation of and funding for the existing national accreditation body for optometry (the Optometry Council of Australia and New Zealand);
- State Panels for each profession;
- A co-located State administration for the smaller professions; (not a Single Entity for all Professions in each state);
- Mirror legislation in each State.
- A "Drivers Licence" model where registration in one jurisdiction is recognized in other jurisdictions



Ms Sue Sluce
Chairperson
Optometrists Registration Board of Tasmania