



## ***SUBMISSION OF THE HEALTH SERVICES COMMISSIONER, VICTORIA, TO THE SENATE COMMUNITY AFFAIRS COMMITTEE INQUIRY INTO NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR DOCTORS AND OTHER HEALTH WORKERS***

---

**DATE: 30 April 2009**

Thank you for the opportunity to respond to this Inquiry. The Office of the Health Services Commissioner (HSC) is an independent health complaints resolution service established under the *Health Services (Conciliation and Review) Act 1987* (the Act). The role of the Office is to promote the Guiding Principles of health care contained in the Act; to provide an independent and accessible review mechanism for users of health services; to provide a means for reviewing and improving the quality of health service provision. HSC deals with users' complaints and helps service providers to improve the quality of health care. HSC works very closely with the 12 registration boards in Victoria to ensure the appropriate body deals with the relevant complaints and this has been a cooperative and fruitful collaboration over the years. The Victorian model is our preferred model for national registration.

### **a. the impact of the scheme on state and territory health services**

There are significant advantages to the health services, public and practitioners from the implementation of the national scheme. The key benefits of the scheme for health services are:

- Consistent and higher national standards for health practitioners improving patient safety;
- Decreased administrative burden and standardisation of registration requirements for health practitioners which will lead to greater mobility, flexibility and improved workforce supply; and
- One point of contact for health services in relation to health practitioners, which will improve the provision of timely and comprehensive information to health services.

**b. the impact of the scheme on patient care and safety**

- The scheme seeks to strike the right balance between the rights of practitioners and consumers when it comes to complaints handling.
- There will be effective procedures for registration and complaints handling in each State and Territory. There will be an office of the scheme in every State and Territory that will provide a 'one-stop' point of contact for consumers and health practitioners alike.
- The scheme will provide for consistent and higher national standards for health practitioners improving patient safety, including rigorous assessment of overseas trained practitioners.

**c. the effect of the scheme on standards of training and qualification of relevant health professionals**

- The scheme will ensure there are consistent standards for training and qualification requirements (for the relevant health professionals) at a national level.
- In Victoria, the *Health Professions Registration Act 2005* provides a framework that requires boards to consult with the Minister for Health on codes and guidelines where they relate to qualifications, supervised practice, examinations for registration or scope of practice or scope of registration in a division of the register. However, this consultation requirement does not extend to accreditation for individual courses or practitioners.

**d. how the scheme will affect complaints management and disciplinary processes within particular professional streams**

- The scheme will ensure consistent standards for the complaints management and disciplinary processes across all of the health professions.
- These processes should be fair disciplinary procedures that abide by the principles of natural justice and provide for adequate protection of rights for complainants and practitioners.
- There should be independent hearings for serious matters by an independent tribunal, where the boards are parties to the matter, as set out in the Intergovernmental Agreement (IGA).

**e. the appropriate role, if any, in the scheme for state and territory registration boards**

- There will need to be at each State and Territory level representation for each of the health professions.
- The National Boards should be bodies which determine the needs of their respective health profession in each State and Territory. The National Board will need to consider appropriate arrangements in each State and Territory based on a number of factors including, but not limited to, the number of registrants across the health profession and the numbers of complaints received in each State and Territory.
- A simple duplication of the current existing State and Territory boards combined with a National Board will be cost prohibitive for a number of professions, increase the bureaucracy and limit the efficiencies proposed by the scheme.

### **Additional points**

- The main principles of the IGA are appropriate and should remain the underpinning philosophy behind the design of the scheme – that means greater public protection, greater mobility, high quality education and training systems, rigorous assessment of overseas trained practitioners and ensuring the public can access high quality health services through a flexible and responsive workforce.
- A fair balance between expert practitioner involvement and consumer involvement should be included in the design of the scheme and must ensure representation of consumers on each national board but alongside a majority of health practitioners from that profession, whose expertise and professionalism is essential to the effective working of the scheme. In Victoria, the *Health Professions Registration Act 2005* has provided for increased community representation on boards. Strong community representation is essential to foster transparent and informed decision making, improve communication to practitioners and the public, and strengthen governance expertise.



Bethia Wilson

**Health Services Commissioner**