



Tuesday, 28 April 2009

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



National Registration and Accreditation Scheme

The Australian Health Ministers' Advisory Council (AHMAC) has put a national framework in place for health workforce regulation which focuses on protection of public health and safety as the primary policy objective.

This Senate Review addresses key points are set out under six headings:

- a. the impact of the scheme on state and territory health services;
- b. the impact of the scheme on patient care and safety;
- c. the effect of the scheme on standards of training and qualification of relevant health professionals;
- d. how the scheme will affect complaints management and disciplinary processes within particular professional streams;
- e. the appropriate role, if any, in the scheme for state and territory registration boards; and

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

The key potential benefits for the scheme for health services are:

- Consistent (and higher) national standards for health practitioners to improve the quality and safety of health care;
- 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 in relation to registered health practitioners, which will improve the provision of timely and comprehensive information

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

The scheme seeks to strike an appropriate balance between the rights of practitioners and the rights of consumers where it comes to dealing with complaints.

Consistent, effective procedures for both registration of properly qualified health practitioners and complaints handling in every State and Territory and a 'one-stop' point of contact for consumers and health practitioners would facilitate more effective management of the health regulation system.

A national scheme can enable the application of consistent and higher national standards (including rigorous assessment of overseas trained practitioners) for health practitioners.

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

Currently standards vary from jurisdiction to jurisdiction and from profession to profession. A national scheme can ensure nationally consistent standards for training and qualification requirements (for the relevant health professionals).

A national scheme must ensure that national consistency is achieved by raising not lowering standards.

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

Currently the variations from jurisdiction to jurisdiction and from profession to profession create confusion and uncertainty. A national scheme can promote consistent standards and approaches for complaints management and disciplinary processes across the health professions. This does not disallow the application of profession-specific strategies where appropriate.

The proposed scheme includes appropriate professional and non-professional involvement. A fair balance between expert practitioner involvement and consumer involvement is essential. Appropriate community representation is essential to foster unbiased, transparent and informed decision making, improve communication to both practitioners and the public, and strengthen governance expertise.

e. The appropriate role, if any, in the scheme for State and Territory Registration Boards;

The National Boards will need to consider appropriate arrangements in each State and Territory to ensure that all the Board functions are carried out efficiently and effectively. This will be based on a number of factors including, but not limited to, the number of registrants within each health profession and the numbers of complaints received in each State and Territory.

Additional points

The case for national regulation of Chinese medicine practitioners has been made compellingly – see submissions on partially regulated professions <http://www.nhwt.gov.au/natreg-prp-28th.asp>, in particular the submission from CMRB. The evidence emerging from the work of the CMRB, which is outlined in this submission, coupled with more recent scientific research, strongly supports the ongoing need for regulation, and the need for national registration.

Costs to the profession including registration fees, are inevitably passed on to the public. This is an additional argument in favour of national registration.

Conclusion

Enhanced public protection, greater mobility for practitioners, high quality education and training systems, rigorous assessment of overseas trained practitioners will contribute to quality health services through a flexible and responsive workforce.

A national scheme is the only appropriate response if the Government is to meet its stated commitment to:

- Protecting the public
- Establishing nationally consistent standards and systems for the regulation of the health professions

The primary and overriding objective of the registration of health professions is to protect public health and safety. There are significant advantages to the health services, public and practitioners from the implementation of a national scheme.

Yours sincerely,



Vivian Lin
President
Chinese Medicine Registration Board of Victoria

