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Australasian Podiatry Council
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Senator Claire Moore
Chair
Senate Standing Committee on Community Affairs

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

Following are responses from by the Australasian Podiatry Council to issues raised in the Inquiry entitled – ‘**Inquiry into the National Registration and Accreditation Scheme for Doctors and Other Health Workers**’.

Should you have any queries on this submission, I can be contacted on 03 94163111 or mobile 0411 741815 and kelli@apodc.com.au.

Yours sincerely

Kelli Cheales
CEO
Australasian Podiatry Council

Executive summary

The Australian Podiatry Council (APodC) would like to take this opportunity to provide comment to the Senate Community Affairs Committee's Inquiry into the National Registration and Accreditation Scheme for Doctors and Other Health Workers.

APodC believes that the National Registration and Accreditation Scheme provides an important opportunity, improve efficiency in the regulatory processes for health professionals in Australia and recognise the important role allied health professionals, such as podiatrists, play in the overall health of the nation. These strategies support the role of the National Registration and Accreditation Scheme as a key reform measure of all Governments through the COAG process in focussing on ensuring the continued delivery of quality health care over the next 10 years.

However, APodC has a number of concerns regarding the overall governance of the scheme, the organisational structure and processes for the accreditation of education and training courses for health professions included in the National Registration and Accreditation Scheme, and the collection and use of information and data related to the National Registration and Accreditation Scheme.

NHHRC Report "A Healthier Future for All Australians"

The recent release of the Interim Report of the National Health and Hospital Reform Commission "A Healthier Future for All Australians" highlighted the desire on behalf of the Federal Government to move to a more integrated health system, including the implementation of Comprehensive Primary Health Care Centres and multidisciplinary teams to improve care for individuals with chronic and complex conditions¹. The 2010 introduction of national registration for the initial group of ten health professions is compatible with this approach, and over time, should in part facilitate health workforce reform in the changing health services of the future.

Governance

The proposed structure of the National Registration and Accreditation Scheme does not provide for effective control of the registration and accreditation processes by the individual professions, as the ultimate responsibility for standards is in the hands of individuals who are not members of the profession.

Accreditation

APodC in conjunction with other health professions included in the National Registration and Accreditation Scheme, are concerned about the possible opposing interests of the Ministerial Council and the evidence based standards and accreditation functions agreed to by the profession-specific national boards.

Consultation Papers released by the National Registration and Accreditation Scheme have indicated that boards should consider applicants not eligible for full registration if they agree to work in an area of need identified by a State or Territory Government. APodC considers this proposal as a threat to the quality of health care. , It is vital to public health and safety that there is no compromise on the standards set for individual professions and to continually improve standards of education and training of health professionals in Australia.

The National Registration and Accreditation Scheme must ensure that current levels of stakeholder consultation, with regards to the setting of professional standards, are maintained against the competing interests of workforce demands and funding pressures. The proposed structure of the National Registration and Accreditation Scheme, with the Ministerial Council controlling funding to National Boards is a potential threat to the independence of National Boards, and the vital work they will perform. National Boards must be allowed to perform these tasks without fear of the removal of funding from the Ministerial Council.

Any accreditation scheme must be independently administered, accountable to the public and the profession, and must make decisions transparently and openly. This would be consistent with world's best practice, as acknowledged by Professions Australia with the adoption of the World Health Organisation/World Federation for Medical Education Guidelinesⁱⁱ for their cross-profession standards development for accreditation processes, "*Standards for Professional Accreditation Processes*"ⁱⁱⁱ.

Collection and Use of Information

APodC also believes that Government should ensure that the right balance is met between the requirement of the National Registration and Accreditation Scheme for information regarding registered health professionals and their right to privacy. Information to be collected should be demonstrably specific to the National Registration and Accreditation Scheme requirements aligned with public health issues and requirements. Research or policy reports prepared from data produced by the National Registration and Accreditation Scheme should be based only on de-identified data. The APodC also recommends that only de-identified data is used when producing state board reports and analysing health service data. Data should be made available to relevant professional organisations to progress other issues relevant to the workforce. Any use of de-identified data for research and evaluation purposes must be submitted for consideration by an appropriate NHMRC constituted research, ethics and evaluation committee.

APodC believes that the National Registration and Accreditation Scheme presents opportunities for greater administrative efficiency deriving from interaction between the proposed National Registration and Accreditation Scheme unique identifier and the Medicare Australia provider number.

A model for National Boards with responsibility for maintaining professional standards and accreditation standards, and established financial independence from the Federal Government would be supported by APodC.

Conclusion

APodC looks forward to the outcomes of this inquiry, and an improved National Registration and Accreditation Scheme, which facilitates evidence-based change to health service provision and improved public health and safety.

ⁱ National Health and Hospital Reform Commission, “A Healthier Future for All Australians – Interim Report December 2008”, Commonwealth of Australia, 2009.

ⁱⁱ World Health Organisation, “WHO/WFME Guidelines for Accreditation of Basic Medical Education Geneva/Copenhagen” 2005.

ⁱⁱⁱ Professions Australia, “Standards for Professional Accreditation Processes”, June 2008.

The Australasian Podiatry Council – Who We Are

The Australasian Podiatry Council is the only professional representative organisation for podiatrists in Australia and New Zealand, and more than 80% of practising podiatrists are members. Individual podiatrists are members of state Member Associations, such as the Australian Podiatry Association in each state, as well as Podiatry New Zealand.

The Australasian Podiatry Council fulfils many important roles for podiatrists and podiatry in Australia and New Zealand. These include:

- Preparation of national policies and clinical practice guidelines for the profession
- Publishing and distribution of bi-monthly *Podiatry Bulletins*
- Production of other specialist publications, e.g. Australian Podiatric Guidelines for Diabetes Assessment, Australian Podiatry Manual
- Public relations programs, including PR resources and media releases
- Liaising with federal government departments and lobbying as required on issues of concern to the profession
- Representation on industry bodies, eg. Allied Health Professions Australia (AHPA), National Allied Health Classification Committee, Standards Association of Australia.
- Organisation of national scientific conference every two years and other specialist national seminars on topics such as practice management
- Setting competency standards for the profession and liaising with Schools of Podiatry regarding undergraduate and postgraduate courses
- Research: providing secretariat and fundraising support for Australian Podiatry Education and Research Foundation.
- Organising a regular labour force survey on a national basis, in conjunction with the Australian Institute of Health and Welfare. Conducting practice fee and costs surveys
- International relations, including trans-Tasman projects and mutual recognition with New Zealand and other projects with the United Kingdom and United States of America.