

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

Dear Sir,

**Inquiry into the National Registration and Accreditation Scheme for Doctors and other Health Professionals**

Thank you for the opportunity to present this submission to the Committee.

The Podiatrists Registration Board of Western Australia does not favour, as proposed, the Nationalisation of Podiatry Registration Boards, or the proposal in relation to Accreditation functions.

- (a) This Board is not aware of any significant benefit a national scheme might have on the podiatric work force. The current situation whereby registration is required in each state would only have an impact on a very small number of practitioners working across various states. The Trans Tasman Mutual Recognition (TTMR) arrangements do not place undue delays on commencement of work in WA. There is however, a small cost impediment.
- (b) The Board knows of no evidence to suggest a national registration scheme would change this situation. Again the process of applying for registration under TTMR ensures this Board is aware of all registered podiatrists in this State. Indeed if there is a concern or complaint which might impact on patient safety and care the Board at a local level can quickly and efficiently investigate the matter.
- (c) The Board recognises that an aim of the proposed system is to have consistency of standards between the various States and Territories. If this is to be a process of accreditation and standardisation of education, the Board has significant concerns as to the potential lowering of such “standards”. The courses provided through the University of Western Australia, at both undergraduate and post-graduate levels, are arguably of a very high standard. There is presently considerable variance around the Country between undergraduate courses, and apart from UWA, no other University offers programs of specialist podiatric post-graduate training. Western Australian podiatric medicine students enjoy a close relationship with medical and dental colleagues inherent in being within the Faculty of Medicine, Dentistry and Health Sciences, and specifically within the School of Surgery. This relationship enhances the production of quality healthcare professionals within the workforce. If the “standard” was to be set at the “lowest common denominator” the Board would have very serious concerns in this regard.
- (d) Complaints in the first instance that are directed to the State Board can often be addressed sensitively and quickly, while in WA those of a more significant nature are handled by the WA State Administrative Tribunal. (To date this Board has not found it necessary to send any complaints to SAT).

- (e) There is a concern that if control was passed to a national board, there will be a reduction or loss of the ability to deal with issues that are regional to Western Australia. We recognise that most States have needs and issues that are unique to their State. However, in the case of Western Australia, we consider that our size and our isolation from the other States give rise to issues specific to Western Australia. The way the consultation process regarding national registration has been conducted to date raises concerns that uniquely Western Australian perspectives, needs and issues will be overlooked.
- (f) An alternative model would be to:
- ✓ Implement a national registration online register (data base).
  - ✓ Continue with a State-based process for other registration matters as currently exists.
  - ✓ Implement uniform legislation in an effort to standardise scope of practice, disciplinary functions, and other general board matters.
  - ✓ Independent accreditation arrangements for education and training to be kept as a role of the professions with government assistance rather than government direction and to be separate from registration arrangements.

The Podiatrists Board is one of the seven Boards in Western Australia that contract their administrative arrangements and do not have employed staff. Those contractors and their staff, along with the Board members, have developed a substantial and invaluable amount of corporate knowledge and expertise. However, as contractors will not be involved in the national scheme, the accumulated knowledge and expertise of the contractors will be lost. In addition the distance and time involved in attending face-to-face meetings in cities other than Perth may also pose great difficulties for WA Podiatrists to participate in a National system. The current arrangement of autonomous Boards with regular self funded combined Australian Podiatry Board meetings ensures equal representation.

The IGA indicates that one of the primary considerations of the Productivity Commission was “the supply of and demand for, health workforce professionals”. We are concerned that the quest for national registration was a workforce philosophy aimed at increasing the number of health professionals available to serve the public. The Board is concerned the educational and practical training requirements for Podiatry and other health professions may be reduced, resulting in an increased risk to the public.

There is significant concern that some smaller professions may be controlled or unduly influenced by larger professions, the Government or public servants to the detriment of the professions and the public. Examples of this include the views of some medical practitioners who consider that a number of other health professionals are developing clinical skills that should be reserved for medical practitioners alone. The Board’s view is that well educated and managed allied health professionals can make a significant and cost effective impact on the health and well being of the Australian public.

Dr Jennifer Bryant  
President, Podiatrists Registration Board of Western Australia.