

Executive Officer, Medical  
Australian Health Practitioners Regulation Agency  
GPO Box 9958  
Melbourne Vic 3001

By email to [medboardconsultation@ahpra.gov.au](mailto:medboardconsultation@ahpra.gov.au)

To whom it may concern

**Proposed registration standard for granting general registration as a medical practitioner to Australia and New Zealand medical graduates on completion of intern training**

Thank you for the opportunity to comment on the consultation paper regarding the above registration standard.

**About us**

The Health Quality and Complaints Commission (HQCC) is an independent statutory body dedicated to improving the safety and quality of healthcare in Queensland. To prevent patient harm and improve healthcare quality we:

- manage healthcare complaints
- investigate serious and systemic issues and recommend quality improvement
- monitor, review and report on healthcare quality
- identify healthcare risks and recommend actions
- share information about healthcare safety and quality
- promote healthcare rights.

**Summary**

The HQCC is very supportive of national consistency regarding all aspects of health practitioner regulation and registration, including general registration on completion of intern training. We also support the standard's stated aims of providing for increased flexibility to address workforce needs, enabling training for increased numbers of medical graduates and ensuring that the educational needs of graduates continue to be met.

**General requirements**

**3. Satisfactorily complete a criminal history check undertaken by the Board that meets the Board's criminal history registration standard**

- While the Board's *Criminal history registration standard* is not the subject of the current consultation paper, we note that the standard does not define how a criminal history check is actually conducted. We suggest that criminal history checks include searches of the records of all state and federal police services, as well as the Australian National Child Offender Register, if they do not already do so.
- Furthermore, the *Criminal history registration standard* does not specify whether crimes committed overseas will be identified. We appreciate there may be difficulties associated with conducting international criminal history checking and suggest that as an alternative, relevant applicants could be required to complete a statutory declaration regarding overseas criminal activity.

- We are aware of a case in which information about a practitioner's criminal activities overseas was identified through the internet and we wonder whether the Board has considered conducting a 'Google' search on applicants as a matter of course.

*6. Provide evidence of English language skills that meet the Board's English language skills registration standard*

- We query whether evidence of English language skills will be required for all applicants or only those with English as a second language.

*Definition of 'evidence'*

- Throughout the standard, we suggest applicants be required to provide *documented* evidence.

**Specific requirements**

*Definition of 'supervision'*

- The standard appears to lack a clear definition of 'supervised clinical practice' or 'supervision' and we suggest that some guidance be provided to ensure the consistency and quality of supervision (e.g. What level of seniority must a supervisor have? What activities do or do not require a supervisor to be physically present?).

*Definition of 'satisfactory'*

- Similarly, 'satisfactory performance', 'satisfactory term supervisor reports' and 'overall satisfactory rating' are not well-defined and we suggest that guidance be provided to ensure consistency of assessments regarding satisfactory performance.

*2. The suitability of posts to satisfy these requirements is to be assessed against guidelines issued from time to time by the Board.*

- We wonder who will complete this assessment of suitability and whether this should be specified in the standard.

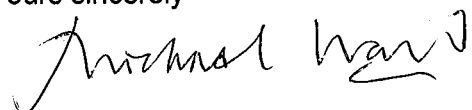
**Specific circumstances**

*Required experience not completed*

- We suggest the following addition to this sentence: '*Under exceptional circumstances, applicants may apply to the Board for renewal of provisional registration...*'.

We wish you well with the consultation process and look forward to the finalisation of the standard.

Yours sincerely



**Professor Michael Ward**  
**Commissioner**

23 August 2011