

24th July 2012

Australian Health Practitioner Regulation Agency
criminalhistoryconsult@ahpra.gov.au

Dear AHPRA

Re: Public consultation paper on international criminal history checks

SHPA is the national professional organisation for nearly 3,000 pharmacists, pharmacists in training, pharmacy technicians and associates working across Australia's health system. SHPA is the only professional pharmacy organisation with a core base of members practising in public and private hospitals and other health service facilities. These pharmacists work within healthcare teams with a focus on supporting the safe and effective use of medicines as their core business.

We note from the consultation paper that projecting the historical data suggests that 6% of international applicants would return a positive criminal history and of those 15% would be assessed as having the potential to affect registration; that is, it may affect the practitioner's suitability to practise the profession in less than 1% of applications.

SHPA agrees that AHPRA needs to balance the requirements for public protection with the need for responsive and timely application and assessment processes for those seeking registration as a healthcare professional in Australia. Therefore we would support *Option 4: Applicant makes declaration and AHPRA undertakes random sample audit*. SHPA believes Option 4 would provide a reasonable and balanced approach providing that:

- the percentage of applicants audited is significant enough to provide a disincentive for false declarations (at least 20-25%)
- auditing occurs in a timely manner and
- auditing occurs across all professions.

Yours sincerely,



Sue Kirska
SHPA Federal President

The Society of Hospital Pharmacists of Australia