



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

Response template: Public consultation - revised *Guidelines for mandatory notifications*

National Boards and the Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the revised *Guidelines for mandatory notifications*.

This response template is an alternative to providing your response through the online platform available on the consultation [website](#).

IMPORTANT INFORMATION

Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

The information collected will be used by AHPRA to evaluate the revised guidelines. The information will be handled in accordance with AHPRA's privacy policy available [here](#).

Publication of responses

Published responses will include the name (if provided) of the individual and/or the organisation that made the response.

You must let us know if you do **not** want us to publish your response.

Please see the [public consultation papers](#) for more information about publication of responses.

Submitting your response

Please send your response to: AHPRA.consultation@ahpra.gov.au

Please use the subject line: Feedback on guidelines for mandatory notifications

Responses are due by: **6 November 2019**

General information about your response

Are you responding on behalf of an organisation?	
Yes	What is the name of your organisation? Optometry Australia
No	Are you a registered health practitioner? Yes/ No If yes, which profession(s)? Are you a student? Yes/ No If yes, which profession?
We may need to contact you about your response. Please write your name and contact details below. (Skip if you wish to remain anonymous)	
Name (optional)	██████████
Contact details (optional)	████████████████████

Public consultation questions

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the revised Guidelines for mandatory notifications.

Use the corresponding text boxes to provide your responses. You do not need to answer every question if you have no comment.

1. How easy is it to find specific information in the revised guidelines

Overall, we believe the information in the revised guideline is presented clearly and ordered logically, making the information relatively easy to understand. We believe that dividing the information by type of notifier and flagging this clearly from the beginning of the document, will support potential notifiers to find the information they are after. Intra-document hyperlinks may further enhance the readers' ability to find the information relevant to them. making clear hyper-links to each of these sections.

2. How relevant is the content of the revised guidelines?

We believe the content is highly relevant. It is important to ensure that practitioners and other potential notifiers have access to comprehensive and readily comprehensible material detailing their responsibilities regarding mandatory notification. This supports public and practitioner health and safety. We do not believe that the guidelines, on the whole, provide information that is superfluous to providing the comprehensive understanding potential notifiers need.

3. Please describe any content that needs to be changed or deleted in the revised guidelines.

On page 16 of the Guideline for Mandatory Notifications- Registered Health Practitioners, a minor edit appears to be needed to change the 'by' in 'Non-treating practitioners must report practitioners who' and 'Employers of practitioners must report practitioners who' to "are". The page numbers provided with regard to 'Treating practitioners' in the table that spans across page 5 and 6, appear to provide incorrect page references.

4. Should some of the content be moved out of the revised guidelines to be published on the website instead?

If yes, please describe what should be moved and your reasons why.

No, we believe it is appropriate to publish all pertinent information in one resource (i.e. one guideline relevant to health practitioners and one relevant to health students) to support those who need it to readily access comprehensive information regarding mandatory notifications.

5. How helpful is the structure of the revised guidelines?

We believe that the structuring of the guidelines according to notifier type enhances accessibility of the content for likely users, as does the separation of information pertaining to notifications about registered professions and students into two separate guidelines.

6. Do the revised guidelines clearly explain when a mandatory notification is required and when it is not?

Please explain your answer.

Yes, we believe so. We believe the addition of the flow charts helps add clarity.

7. Are the flow charts and diagrams helpful?

Please explain your answer.

Yes, we believe so, and they help accommodate the fact that different individuals find information more accessible to access in different formats and that some may find the flow charts provide more accessible information than the plain text.

8. Are the risk factor consideration charts helpful?

Please explain your answer.

Yes, though the degree to which they are helpful will depend on the individual reader and the specific nature of the situation they are considering. The charts provide guidance on factors to consider when assessing risk, and in this way may help enrich a potential notifiers consideration.

9. Are the examples in the revised guidelines helpful?

Please explain your answer.

Yes, it is useful to include short examples and we believe those provided will assist user understanding.

10. Should there be separate guidelines for mandatory notifications about students or should the information be included in guidelines about practitioners and students (but as a separate section)?

Please explain your answer.

We believe there are benefits to clarity and to the brevity of each guideline of having them as separate guidelines.

The revised guidelines explain that it is not an offence to fail to make a mandatory notification when required, but a National Board may take disciplinary action in this situation.

11. Is this made clear in the revised guidelines?

Please explain your answer.

Yes, we believe so. It is useful that this information is provided in each section for each of the different potential notifier groups.

12. Is there anything that needs to be added to the revised guidelines?

13. It is proposed that the guidelines will be reviewed every five years, or earlier if required.

Is this reasonable?

Please explain your answer.

Yes, we believe this is reasonable.

14. Please describe anything else the National Boards should consider in the review of the guidelines.

15. Please add any other comments or suggestions for the revised guidelines.

Thank you!

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the Guidelines for mandatory notifications.