Public consultation on a draft Data strategy

Submission template

The Australian Health Practitioner Regulation Agency (Ahpra) is inviting feedback on our draft Data strategy. The Data strategy will guide how we use data that we collect and store.

We are inviting responses to specific questions about our future use of this data and general comments on the draft Data strategy.

In addition to the Data strategy on page 4 of the consultation paper, we are consulting on the future directions for three focus areas:

- the public register of health practitioners
- data sharing, and
- advanced analytics.

Publication of submissions

We publish submissions at our discretion. We generally publish submissions on our website to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or if you want us to treat all or part of it as confidential.

Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.

Do you want your responses to be published?

☒ Yes I want my responses to be published

☐ No I do not want my responses to be published

Your contact details

Name: Dr Stephen Liew

Organisation: Australian Dental Association

Contact email: ███████████████

How to give feedback

Please email your submission in a Word document (or equivalent) to AhpraConsultation@ahpra.gov.au by 31 January 2023.

Submission template

Please read the public [consultation paper](#) (including the draft Data strategy) before responding. The draft Data strategy can be found on page 7 of the consultation paper.

Draft Data strategy
1. Does the draft Data strategy cover the right issues?
Yes.
2. Do you think that anything should be added to or removed from the draft Data strategy?
No.

Focus area 1: The public register
3. Do you agree with adding more information to the public register? • If yes, what additional information do you think should be included? • If no, please share your reasons
Yes. CURRENT SITUATION The public register allows members of the public to 'look up a health practitioner'. The category in which our members are listed is 'Dental Practitioner'. The 'Dental Practitioner' category includes the following divisions: Dentist, Oral Health Therapist, Dental Therapist, Dental Hygienist, Dental Prosthetist. A 'Speciality' column is visible for 'Specialist' registration types, e.g. Prosthodontics. SUGGESTIONS We believe it would be helpful if users could search specifically for practitioners within the division they are interested in, e.g. Dentist, and for search results to include only Dentists in such a scenario. Further, we think it would be helpful if users could search specifically for specialists, e.g. Prosthodontist, and for search results to include only Prosthodontists in such a scenario.
4. Do you agree with adding health practitioners' disciplinary history to the public register? • If yes, how much detail should be included? • If no, please share your reasons
No. Doing so could adversely affect the reputation of the practitioner and/or any practice at which they may work. While disciplinary decisions may involve due process and procedural fairness, the possibility exists for error to be present in a decision itself, or in administration pertaining to it, e.g. data entry on a register.

Disciplinary history could potentially be misinterpreted or misrepresented by members of the public or in local media.

It might be difficult for users of disciplinary history information to distinguish, for example, where restrictions have been met or no longer apply.

The well-being, mental health, and willingness of a practitioner to continue in their profession would also be important factors to consider.

5. How long should a health practitioner's disciplinary history be published on the public register?

☐ 0 to 1 year

☐ 1 to 4 years

☐ 5 to 10 years

☐ 10 to 20 years

☐ As long as the practitioner is a registered health practitioner

☒ Disciplinary history should not be published on the public register. Only current conditions or limits on practise should be published on the public register.

☐ Other, please describe: Click or tap here to enter text.

6. Who should be able to add additional information to the public register?

Only AHPRA should be able to add information to the public register, and only after its verification.

7. Are there other ways to enhance the effectiveness and value of the public register for the public and/or practitioners?

The ability to search by practitioner name, and for results returned to include near or misspelled words may be useful.

Focus area 2: Data sharing

8. The Health Practitioner Regulation National Law enables us to share data with some other organisations in certain situations. Do you have suggestions about how Ahpra could share data with and/or receive data from other organisations to benefit the public, practitioners and/or our regulatory work?

CURRENT SITUATION

The ADA makes use of National Registration and Accreditation Scheme statistics published by AHPRA, i.e. *Dental Board of Australia Registrant data* quarterly reports.

The reports contain a variety of tables, the nature of which suggest to us that data could be published in more granular fashion.

SUGGESTIONS

We would value data being expressed in more specific ways, and we would value the data being expressed relative to Division.

For example, we would be interested to see the number of Dentists, by gender, by State.

Presently this is not reflected, because this data is presented at the 'Dental Practitioner', rather than Division, level. The demographics of Dentists are quite different from the other Divisions within that Category, so we don't find this information particularly useful for our needs.

Similarly, we would be interested to see the number of Dentists, by State, by other identity characteristics, such as age group, ethnicity, languages spoken, Indigenous status, disability, etc.

We would value enhanced notification and detail about complaints, which could help inform our development of clinical guidelines.

We are interested in workforce trends such as number of 'exits', i.e. Dentists who have moved to non-practising status, or who have not renewed their registration.

We encourage AHPRA to continue attempting to share data it collects in an efficient, secure, and cost-deflationary (for purchasers of data) manner.

Focus area 3: Advanced analytics

9. Do you have any suggestions about how Ahpra should approach using advanced analytics and machine learning technologies?

Advanced analytics and machine learning technologies present exciting possibilities to help inform future decision-making. AHPRA may like to consider attempting to use these technologies for:

- identifying patterns in complaint data that might suggest a practitioner or practice is at high risk of causing harm
- using natural language processing to review and classify large volumes of text, such as written complaints
- monitoring social media or other sources for information about practitioners, such as breaches of AHPRA Advertising Guidelines or the Code of Conduct.

Other

10. Please describe anything else Ahpra should consider in developing the Data strategy.

Nothing further to add at this stage.

Thank you

Thank you for participating in this consultation. Your feedback will support Ahpra and the National Boards to use data to improve public safety.

Please email your submission to AhpraConsultation@ahpra.gov.au by 31 January 2023.

Ahpra acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures and Elders past, present and emerging.