

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 These submissions will not be published on the website or elsewhere.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: [REDACTED]

Organisation: Occupational Therapy Australia

Contact email: [REDACTED]

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
<p>1. Does the draft Data strategy cover the right issues?</p>
<p>Occupational Therapy Australia (OTA) is on a digital transformation journey in a similar vein as AHPRA. Part of that journey is seeking to improve our approach to collecting and using data to better support and resource our profession to deliver optimal health outcomes for individuals and communities.</p> <p>We recognise the importance of data sharing to provide accurate, timely and complete data for insights and learning in order to give greater benefit to both practitioners and the public. At the same time, we understand the need to build trust and confidence for both the public and practitioners in how we use their data through clear ownership, consent and agreements to protect, verify, and secure that data.</p> <p>Similarly, OTA is keen to explore the use of data and data-sharing capabilities, including two-way data exchange to provide additional transparency to the public, practitioners, and Government agencies. We believe that peak professional bodies, such as OTA, can provide verified data to AHPRA on additional education and training, such as we currently do in the space of Better Access to Mental Health to assist the public to make informed choices. This would help to maintain and build trust across the allied health sector publicly.</p> <p>The sharing of data between AHPRA and peak professional bodies may also have benefit beyond the verification of expertise amongst practitioners for the public, but also support the efficient auditing of practitioners with real-time sharing of credentialing and CPD. Information sharing in this way across peak professional bodies to AHPRA would also support the aims of the Data strategy in providing insight into the practitioner lifecycle, from student through registration to retirement, to inform workforce planning and regulatory policy. In turn, this would support peak professional bodies to continue to tailor training and education in line with workforce needs and ultimately public benefit.</p> <p>We are pleased to see that AHPRA's draft Data strategy reflects much of the aforementioned intentions and would welcome the opportunity to further explore these areas of the strategy with AHPRA.</p>
<p>2. Do you think that anything should be added to or removed from the draft Data strategy?</p>
<p>OTA appreciates that AHPRA regulates Australia's health practitioners in partnership with the National Boards. We also recognise that the individual peak professional bodies have an important role in managing the specific needs of each discipline to maintain a strong professional practice. We would therefore suggest extending the two-way data exchange from health sector employers and Government agencies to peak professional bodies as a key piece to this Data strategy.</p>
Focus area 1: The public register
<p>3. Do you agree with adding more information to the public register?</p> <ul style="list-style-type: none">• If yes, what additional information do you think should be included?• If no, please share your reasons

We support AHPRA in sharing information to the public that is relevant to the safety of consumers.

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

If AHPRA and the relevant board determines that health practitioners' disciplinary history is of relevance to public safety, we support this.

We would not support this however as a general rule, and care needs to be taken when determining what information is made available on the public register.

If practitioners have taken genuine actions to rectify issues related to their disciplinary history, have met conditions that were placed on their practice, and have been practicing appropriately since, there is risk that history being available may lead to them having challenges with obtaining employment. This must of course be balanced with the rights of the public to make an informed decision about which health professionals they engage with.

We suggest that disciplinary history be classified by level of severity to reflect practitioners' current performance and not disadvantage those who have successfully rectified issues and continue to provide exemplary and safe services.

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: As above, possibly a matrix based on types, or severity of notification.

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

AHPRA (utilising information provided by verified external sources as appropriate)

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

Add credentials or endorsements, for practitioners with specific expertise (provided these are verified by an appropriate source such as the peak professional association).

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?

OTA is keen to enter into a two-way data sharing partnership with AHPRA and would welcome further exploring the potential of this sort of peak professional body/AHPRA partnership as part of the Data strategy.

OTA has regular and frequent contact with our Occupational Therapy membership and can provide AHPRA with accurate professional learning and development credentials and any changed contact details of each registered Occupational Therapist in Australia in real time. OTA's member information could also support a more efficient auditing process for AHPRA through a data sharing arrangement. This will enable AHPRA to maintain a more accurate register of Occupational Therapists to better inform its work and understand risks and behaviours.

Additionally, an accurate and up to date register provides the public with a more trusted source that informs their choices and benefits the practitioners by not having to update multiple sources of information. OTA could play a role in ensuring that verifiable data is added to that register as a trusted source of information for the public rather than relying on individual practitioners to manually update unverified information to the AHPRA register.

To provide this data to AHPRA, it would be vital for OTA to receive practitioner contact information from the source of truth, AHPRA, to ensure all shared information is synchronised successfully. We believe this would fit within the tenets of the Data strategy and is a positive step forward in the management of practitioner data to contribute to the safety and quality of health care.

Focus area 3: Advanced analytics

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

Our understanding is that AHPRA is largely looking to utilise advanced analytics to improve its internal processes and find efficiency in the work it does to support the community and individual consumer from a risk perspective.

Beyond this, OTA believes it would be of considerable value to be able to utilise the relevant data sets AHPRA maintains to support workforce planning for a sustainable health workforce.

Equally, OTA would welcome the opportunity to discuss the provision of additional data sets where appropriate from our own daily contact with our members in order to ensure accurate, reliable and complete data, and support the aim of insight generation to greater benefit the health workforce and the public, through a better understanding of the lifecycle of the profession.

Other

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

There are two areas which we believe AHPRA should also consider (and may be considering in the detail of the Data Strategy):

- a) User experience - consideration of how a consolidated view to the public of all relevant, verified information might be provided to the public on a practitioner across both AHPRA and peak professional bodies.
- b) Data ownership – clarity on data ownership to support best practice around consent, data management and avoidance of dual provision of data for practitioners where there is the ability to share key data between AHPRA and peak professional bodies.

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.