

Respondent

< 5 Anonymous >

09:26  
Time to complete

1. Name \*

Dr Alan Duncan

2. Organisation

3. Email address \*

4. The National Boards and Ahpra publish submissions at their discretion. We generally publish submissions on our websites to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published. \*

- Submission can be published
- Submission NOT to be published

5. Do the draft revised regulatory principles reflect the policy directions issued by CoAG Health Council? If not, how could the principles be improved?

Yes

6. Do the draft revised regulatory principles support Ahpra and the National Boards regulatory decision-making? If not, how could they be improved?

Yes

7. Is the content of the draft revised regulatory principles helpful, clear and relevant?

Yes

8. Is there any content that needs to be changed, added or deleted in the draft revised regulatory principles?

Firstly, in Principle 5: it is unfortunate if the principle of "minimum regulatory force" is removed although I understand that the regulatory action needs to remove/reduce the risk AND protect the public. In the proposed Principle this has been hardened up to "necessary regulatory action". There remains concern amongst practitioners of overzealous action by Ahpra and the Boards and the proposed changes are likely to reinforce that view. Secondly, in Principle 6: the deterrence should be for the practitioner to whom the notification applies AND to other practitioners. Finally, many clauses after the first still refer to "we". I appreciate that including "the National Boards and Ahpra" each time becomes clumsy but there remains great confusion amongst practitioners about the role of Ahpra versus the Boards. Perhaps "we" should be defined in the introduction to overcome this issue?

9. Please add any other comments or suggestions for the draft revised regulatory principles.