



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	
Yes	What is the name of your organisation? Nursing & Midwifery Health Program Victoria (NMHPV)
No	Are you a registered health practitioner? Yes/No YES If yes, which profession(s)? Nursing Are you a student? Yes/No 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
The revised guidelines were clear and easy to navigate.
2. How relevant is the content of the revised guidelines?
The content was most relevant.
3. Please describe any content that needs to be changed or deleted in the revised guidelines.
Page 5. Table, 'Types of risks and reporting thresholds for different groups'. 'Sexual misconduct' column, the reference to "...might engage in sexual misconduct..." would benefit from a definition or explanation to guide the reader on the context of what is meant by "...might engage in sexual misconduct..."
Page 7. 'What doesn't need to be reported?' Paragraph 4, "You also might not need to make a mandatory notification..." would benefit from being firmer and clearer.

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.

The content included in:

1. "Mandatory notification requirements" and 2. "Concerns to report" could be published on the website and in Board communiques, in **addition** to the guidelines document, as a way of raising awareness and keeping this front of mind.

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

This was found to be very helpful.

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

Please explain your answer.

The revised guidelines were clear.

7. Are the flow charts and diagrams helpful?

Please explain your answer.

The charts and diagrams were helpful.

8. Are the risk factor consideration charts helpful?

Please explain your answer.

These charts were helpful.

9. Are the examples in the revised guidelines helpful?

Please explain your answer.

These examples were helpful.

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.

The information should be included in guidelines about practitioners and students (but as a separate section)?

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.

This needs to be made clearer to ensure the reader is left in little doubt of their obligations. Whilst there is ever a possibility of the National Board taking disciplinary action in this situation there's a sense the individual may notify as a default action to protect themselves from disciplinary action 'just in case'.

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

No

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

Is this reasonable?

Please explain your answer.

Two to three year reviews would be more reasonable to ensure timely responses to necessary change.

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

Distribution and promotion of a one-page, plain language statement with the key points clearly articulated.

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

Thank you for this opportunity.

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.