



31 October 2013

Australian Health Practitioner  
Regulation Agency (AHPRA)  
GPO Box 9958  
Melbourne VIC 3001

By email: [criminalhistoryconsult@ahpra.gov.au](mailto:criminalhistoryconsult@ahpra.gov.au)

Dear AHPRA Secretariat

### **Submission in response to consultation on international criminal history checking**

The Royal Australian and New Zealand College of Ophthalmologists (RANZCO) appreciates the opportunity to provide feedback on the proposed approaches to international criminal history checking by AHPRA when assessing applications for registration.

RANZCO's mission is to drive improvements in eye health care in Australia, New Zealand and the Asia Pacific region through continuing exceptional training, education, research and advocacy. Underpinning all of RANZCO's work is a commitment to: best patient outcomes; providing contemporary education, training and continuing professional development; evidence based decision making; collaboration; and collegiality. RANZCO also seeks to educate the general public in all matters relating to vision and the health of the human eye and advocates for accessible ophthalmology services for patients.

RANZCO acknowledges the importance of amending the current self-declaratory arrangements. The risks and benefits of the various options have been discussed in detail in the consultation paper and in submissions to the previous consultation held in 2012. Having considered these, RANZCO support an approach that combines elements of Options 2 and 5.

Under the approach preferred by RANZCO, an applicant who declares they have lived in a country other than Australia for 6 months or more should undergo an international criminal history check by an external provider at the applicant's cost and should only be registered when clearance has been obtained.

RANZCO consider it inappropriate for an applicant to be registered for any period of time before clearing the relevant international criminal history checks. While concern has been raised about delays in registration due to the time taken for these checks, the use of an external provider that has expertise in international criminal history checking and relationships with relevant organisations in each country would ensure the process occurs as efficiently as possible.

Using an external provider would also alleviate issues that arise under the current arrangements when an applicant is unable to obtain a criminal history check for a particular country, for example due to political or administrative reasons. The external provider would either be able to obtain one owing to its expertise, or in the alternative, confirm that a check is not possible for that particular country.

The approach proposed above would ensure the objectives of the national registration and accreditation scheme are safely met. However, in the event AHPRA is unwilling to accept the suggestion of a hybrid of Options 2 and 5, RANZCO support Option 2 on the basis that an applicant should not be registered until they have cleared the relevant checks.

Should you require any further information in relation to this submission, please contact RANZCO Policy Officer, Ritu Mohan at [REDACTED]

Yours sincerely



Dr David Andrews

**RANZCO CEO**