

2nd December 2011

Dr Phillip Donato - Chiropractor,
Chairperson
Chiropractic Board of Australia
practice.consultation@ahpra.gov.au

Re: Definition of Practice consultation paper

Dear Dr Donato,

Thank you for providing the opportunity to provide feedback on the common *definition of "practice"* used by the 10 health professions regulated under the *Health Practitioner Regulation National Law Act* (National Law).

Re: The Definition

Question 1: Are there any other factors that the National Boards should consider when advising whether or not a person needs to be registered?

This appears a good summary of relevant factors.

Re: Direct clinical roles / patient or client health care

Question 2: Do you support this statement? Please explain your views.

Yes - this is a fundamental objective in requiring registration of health practitioners.

Re: Indirect roles in relation to care of individuals

Question 3: Do you support this statement? Please explain your views.

Yes – as an accrediting body, we consider this very important.

RE: Non-clinical roles / non-patient-client care roles

Question 4: Do you believe that health practitioners in non-clinical roles / non-patient-client care roles as described above are "practising" the profession? Please state and explain your views about whether they should be registered and if so for which roles?

No, the term 'practising' is not the most appropriate term for these qualified health practitioners.

Registration should be an option for these practitioners; however the category “Non-practising”, as provisioned in the National Law, should be available to them. Perhaps included in the broad examples mentioned, roles such as in accrediting bodies on inspection teams or committees, and some educators would be more specific examples suited to the non-practising registration category.

Re: Education and Training

Question 5: For which of the following roles in education, training and assessment should health professionals be registered?

With regard to the first three dot points, it is necessary that registered professionals are primarily used in these circumstances. However this is not to say unregistered or non-practising professionals could not be used to supplement training in these settings if under the supervision of registered professionals.

Health professions may have differing requirements in these settings based on professional circumstances.

Re: Options for consideration

We would support *option 2* because it fulfils the Board’s requirements under the National Law while not unnecessarily burdening health professionals whose contribution benefits the professions without endangering the public.

This definition may also indirectly assist in ensuring public safety, as under the current definition practitioners in administrative or similar roles, with no recent clinical experience, could return to clinical practise without having to prove competency in that environment.

Yours sincerely



Dr Michael Shobbrook
Chairperson