

17<sup>th</sup> August 2012

Mr. Martin Fletcher  
CEO  
Australian Health Practitioner Regulation Agency  
GPO Box 9958  
Melbourne 3001

Dear Sir,

**Re: Public consultation paper on international criminal history checks**

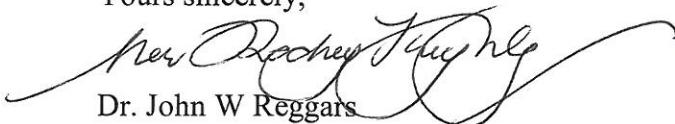
The Chiropractic & Osteopathic College of Australasia (COCA) welcomes the opportunity to comment on this public consultation paper and recognises the importance of this issue in determining the suitability of applicants to become registered health practitioners.

COCA is of the view that Option 2 provides the most effective means of determining an applicant's suitability for registration as a health practitioner in Australia. In order to ensure that applicants do not pose a risk to public and for the appropriate registration board to determine their suitability for practice it is essential that the available criminal history of each applicant be reviewed. Relying on an individual to provide a declaration about their criminal history is not an adequate means of determining their suitability for registration in Australia. Similarly, auditing an applicant on a random basis and after their registration, will in no way safeguard the public from those practitioners, albeit small in number, who may pose a risk to the public due to an undisclosed criminal history.

It is understood that each option has its advantages and disadvantages and that Option 2 has its shortcomings. However, COCA believes that Option 2 will be the most effective means of checking an applicant's criminal history record and therefore the best method of providing for the protection of the public by ensuring that only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered.

We hope you find our submission of some assistance in this matter.

Yours sincerely,

  
Dr. John W Reggars  
CEO/Vice President