

Australian Health Practitioner Regulation Agency  
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VIC 3001

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

28<sup>th</sup> October 2013

Dear Sir or Madam,

**Re: Consultation on International Criminal History Checking**

Thank you for the opportunity to comment on the proposed new approach to international criminal history checking for health practitioners.

The Dental Hygienists' Association of Australia (DHAA) Inc. believes that protecting public safety should be the guiding principle and the overriding concern in these discussions. Regulators must ensure that licensed health practitioners in Australia are worthy of the trust placed in them by patients. A reliable and thorough system is needed to check the international criminal history of those wishing to practice in Australia.

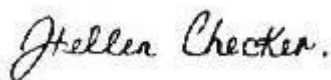
DHAA Inc. can therefore only support certain elements of the proposed new option 5. We welcome the proposal that comprehensive international criminal history checks should be carried out by an external provider with the applicant to be responsible for all costs incurred. This is a clear approach, mirroring a well-established system for checking domestic criminal history. The involvement of a third-party agency adds an important layer of independent scrutiny, reducing any risk of bias. The Boards should continue to conduct random audits on previous applicants as a quality assurance safety net.

DHAA Inc. also supports the continued requirement for all applicants to have an Australian criminal history check prior to registration, even if they declare that have not previously been to Australia.

However, DHAA Inc. cannot support the granting of registration based on a declaration of international conduct only. It is our belief that, for reasons of patient safety, every applicant should have their international criminal history checked *prior* to registration. As public safety is paramount, these checks should apply to countries where applicants have lived for three months or more. This strikes the best balance between the need to exclude short overseas visits and the need to identify cases of criminal activity abroad.

New immigrants to Australia have already been through a rigorous process of medical and criminal checks in order to obtain a residency visa. Ideally, if the law permits, these existing international criminal history checks could, with the applicant's permission, be used by other domestic agencies within a certain time-frame. Such an arrangement may speed up the process of registration and avoid the need for multiple checks of a person's international criminal history by different agencies.

Yours sincerely,



**Hellen Checker**  
**National President**



The Dental  
Hygienists'  
Association of  
Australia Inc.