

31 October 2013

AHPRA

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



Dear Sir/Madam

**Re: Consultation on international criminal history checking (the "Consultation paper")**

Established in 1925, MDA National is one of Australia's leading providers of medical defence and medico-legal advocacy services. With over 25,000 members, it works in close partnership with the medical profession on a wide range of issues which have the potential to adversely impact upon the practice of our Members, and the medical profession as a whole.

Thank you for the opportunity to provide comments about how the proposed Option 5, as discussed in your Consultation paper, is likely to impact upon our Members.

**Should international criminal history checks be conducted for countries where applicants have spent three months or more, or six months or more?**

MDA National's view is that this specified period should be at least six months. The international criminal history check will impose a financial burden on those applicants who meet the relevant definition. Any decrease in the specified period will result in a larger cohort of applicants subject to the international criminal history check and the associated costs with this process.

As outlined in the Consultation paper, applicants will still be required to declare their entire criminal history to AHPRA and imprisonment terms for serious offences would be longer than six months.

**Cost / Benefit ratio**

MDA National proposes that if Option 5 is adopted by AHPRA, it should be done so in a trial fashion and relevant data captured for discussion and review at a specified future time. It is important that there is an appropriate balance between the requirements for public protection and the additional costs imposed upon applicants in obtaining the required international criminal history checks.

Thank you for the opportunity to provide feedback in relation to the Consultation paper. If you wish to discuss any of these issues further, please do not hesitate to contact me.

Yours sincerely

**Dr Sara Bird**  
**Manager, Medico-legal and Advisory Services**  
**MDA National Insurance Pty Ltd**  
Phone: 1800 011 255  
Direct: [REDACTED]  
Email: [REDACTED]

Office: Level 5, 69 Christie Street ST LEONARDS NSW 2065

Freecall: 1800 011 255 Email: [peaceofmind@mdanational.com.au](mailto:peaceofmind@mdanational.com.au) Web: [www.mdanational.com.au](http://www.mdanational.com.au)

Member Services Fax: 1300 011 244 Claims Fax: 1300 011 235 Risk Management Fax: 1300 011 240