

Oral Health Professionals Association Incorporated - ABN 84 179 489 792

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24 October 2013

Att: Wendy Chappell

Australian Health Practitioner Regulation Agency
G.P.O. Box 9958
Melbourne VIC 3001

Dear Wendy,

RE: Public Consultation revised international criminal history checks proposal September 2013

I refer to your email 4th October 2013 inviting written comments on the new Option proposed in the above submission. The Oral Health Professionals Association has considered *Option 5: External Provider conducts international criminal history checks*, as forwarded in the context of the questions posed; these being:

Is the proposed new approach the best option?

Certainly Option 5 as presented offers AHPRA an outcome that minimises the public and AHPRA risk yet does not delay the registration.

However, for all applicants, there will still be a new cost burden that could be deemed prohibitive as the tender process (and therefore cost) has not been conducted. Additionally, the risk of pre-registration of the applicant prior to CCC may not be small, as indicated in the paper, if the time to deliver the report is not "short". A declared and measurable delivery timeframe should be established and maintained, otherwise this risk escalates and mitigates any other benefits.

Is the proposed approach clear?

As presented in the paper, OHPA agrees that it is clear.

Are there any risks or issues about the proposed process that need more consideration?

Whenever a new party is introduced there are always new risks and issues to be managed. Questions such as:

- Who is responsible should an invalid or incorrect report be submitted for an applicant who then goes on to commit a crime against a member of the public as a practitioner?
- Penalties if reports are not submitted in the declared timeframes?
- Third parties security of payment – i.e., what if applicant/s do not pay?
- Contract management – has AHPRA the resources and skills to manage and provide audits of third party?

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

The OHPA suggest six months or more is an appropriate time.

Thank you for the opportunity to comment on Option 5 as tabled. At this time we have no further comment, however, happy to discuss any of the comments made in response.

Kind Regards

Chantelle Adams
Chief Executive Officer
Oral Health Professionals Association