



**To: Australian Health Practitioner Regulation Agency**

**From: Dr Geoff Franklin, Executive Director,  
SA Dental Service**

**Date: 31 October 2013**

**Re: Australian Health Practitioner Regulation Agency  
(AHPRA)– Consultation document titled “*International  
Criminal History Checks*”**

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SA Dental Service has considered the Australian Health Practitioner Regulation Agency (AHPRA) – Consultation document titled “*International Criminal History Checking*” paper and provides the following feedback for consideration.

As highlighted in the paper following feedback from the 2012 document consultation, a supplementary 5<sup>th</sup> option has been presented for consideration.

In response to the specific questions the National Boards have sought feedback on SA Dental Service provides the following information.

- **Is the proposed new approach the best option?**  
Option 5 has potential to achieve good outcomes. It would establish a similar process for checking international criminal histories to the current process for checking domestic criminal histories through CrimTrac. It would strike a reasonable balance between risk, undertaking comprehensive checks where appropriate and not imposing unnecessary delays on applicants becoming registered.
- **Is the proposed approach clear?**  
Yes the proposed approach is clear. The applicant would be required to meet the cost of the international criminal history checks. These checks would be undertaken by an AHPRA approved agency. Existing general requirements would continue to apply. This includes a requirement for every applicant to undergo a domestic criminal history check, make a declaration about their criminal history and arrange the provision of Certificates of Registration Status from every jurisdiction where they have been registered.
- **Are there any risks or issues about the proposed processes that need more consideration?**  
SA Dental Service supports the benefits and risks identified in the Consultation Paper with respect to Option 5 and believe it offers a robust option affording a good level of protection for the Australian public.

SA Dental Service reiterates its requirement to comply with all SA Directives. Currently this includes requirements for criminal offender checks and clearance certificates that align most closely with original Option 2. This practice has been in place for some years and has worked effectively and not proven to be too onerous for prospective employees.

Should AHPRA adopt Option 5, SA Dental Service will continue to be compliant with its state jurisdictional requirement for all new employees to supply full Criminal Certificate Clearances as a condition of employment. Whilst the requirements of AHPRA and SA Department for Health and Ageing will not fully align under Option 5, neither are they incompatible.

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

SA Dental Service concurs with the consultation paper that checks need not be done in countries where applicants have lived for less than a specified time from a practical perspective as well as a risk perspective.

SA Dental Service believes undertaking criminal checks in countries where applicants have spent six months or more is a reasonable approach offering a balance between cost for applicants and risks.

In summary, SA Dental Service supports the implementation of Option 5 and acknowledges the benefits and risk as identified in the consultation paper.

A handwritten signature in black ink, appearing to read 'G. Franklin', written over a horizontal line.

Dr Geoff Franklin, Executive Director  
SA Dental Service