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Consultation on draft guideline for informing a Board about practise locations

Optometry Australia, the peak professional body for optometrists in Australia, welcomes the opportunity to provide input to AHPRA's consultation on the draft guidelines for registered health professionals regarding 'Informing a Board where you practise'.

We believe that it is important that AHPRA's guidelines are clear and comprehensive, in order to support compliant behaviour by registered health professionals and to minimise confusion. We believe that the guideline as drafted is, in the most part, suitably clear and comprehensive, however, there are a small number of areas where greater clarity is required, as overviewed below.

- On page 5 of the guidelines, and quoting the National Law, it states that: "premises at which the practitioner practises does not include the residential premises of a patient of the practitioner." For the sake of clarity, we suggest that the guideline needs to specifically advise practitioners whether or not this includes where a practitioner regularly provides services in a residential facility, such as a residential aged care facility.
- On page 9 of the draft guideline there is a discussion regarding 'Practitioners who provide services for, or on behalf, of an entity in a paid, voluntary or honorary capacity.' We believe further information is needed here to ensure clarity for practitioners. One of the examples listed of when practitioners provide services under this section is as an 'office holder of boards or committees relating to health research, the development of health policy or the governance of a health provider or industry body.' Such arrangements commonly do not involve the direct provision of clinical services, and may or may not require the practitioner to employ their clinical knowledge. As it is currently written it is unclear in which contexts the health practitioner would be required to provide details of the entity they are involved with in this way.
- Relatedly, many practitioners practise in contexts that do not provide the direct provision of clinical services to patients, for example in teaching institutions or research bodies. The guidelines as drafted do not clearly specify whether or not they apply to practitioners when practising in a context that does not involve direct service provision to patients. We recommend that this is clearly articulated.
- The draft guidelines as they stand do not specify whether or not they apply to only Australian contexts of practice, or whether the practitioner is also required to detail international contexts in which they may regularly, or recently, have practised, for

example in providing international voluntary service provision. To ensure comprehensiveness we recommend this is specified.

- The guidelines suggest that practitioners are required to provide information that “is current at that time”, but do not provide guidance regarding what constitutes ‘current.’ This has relevance for practitioners who may have recently provided services in a practice or context that they do not regularly or routinely work in, or no longer provide services in, for example if they provide locum services, have recently changed employment or have provided one-off services as a volunteer. We recommend this issue is addressed with greater clarity through the guideline.

Thank you for this opportunity to provide input.

Yours sincerely



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