

Revised Regulatory Principles

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Lead Contributor

Dr Liz Thyer

The National Boards and Ahpra are inviting feedback on the following questions:

1. Do the draft revised regulatory principles reflect the policy directions issued by CoAG Health Council? If not, how could the principles be improved?

In the Preamble, we suggest the below change to strengthen the role of community expectations:

*“The regulatory principles **reflect** community expectations and ~~reflect~~ ministerial directions.”*

2. Do the draft revised regulatory principles support Ahpra and the National Boards regulatory decision-making? If not, how could they be improved?

We agree with the draft, especially the reworking of principle 2 strengthens the decision-making stance

3. Is the content of the draft revised regulatory principles helpful, clear and relevant?

Yes

4. Is there any content that needs to be changed, added or deleted in the draft revised regulatory principles?

Principle 6 states “Our responses are designed to not punish practitioners” and “consider the need to effectively deter other practitioners from engaging in similar conduct.” However these two statements do not seem to correspond to the policy direction point 3: which notes “the need for effective deterrence must outweigh consideration of the potential impacts upon the practitioner from any regulatory action”

If the need for deterrence will outweigh consideration of impact on the practitioner, then this should be made clear to practitioners, and the public, in the principles. That is not currently the case

5. Please add any other comments or suggestions for the draft revised regulatory principles.

Principle 5 – preferred term is Indigenous Australians rather than Aboriginal and Torres Strait Islander Peoples.