

Respondent

< 17 Anonymous >

39:24
Time to complete

1. Name *

James Ansell

2. Organisation

Individual consumer

3. Email address *

[Redacted]

4. The National Boards and Ahpra publish submissions at their discretion. We generally publish submissions on our websites to encourage discussion and inform the community and stakeholders. Please advise us if you do not want your submission published. *

- Submission can be published
- Submission NOT to be published

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

Yes "Policy direction 2019-1" would appear to be well covered. However to better cover "Policy direction 2019-2" an additional principle should be added in that highlights the process by the AHPRA develops, maintains and updates the regulations that it enforces. Where the principle explicitly states that AHPRA will do both broad public consultation but

also targeted consultation with consumer and patient bodies in this process to ensure the regulations are to the satisfaction of the community.

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

Yes they do, but the obvious caveat on that is that these are very broad and high level so the 'devil will be in the detail'. So these principles can be improved with subsequent work developing and consulting on those more specific things. For example, in principle 5 the statement "we apply the necessary regulatory response to manage the identified risk" is inherently a reasonable principle to have. However what exactly 'necessary' is will be where the contentions can come in between the community views, practitioner views, Board(s) views and AHPRA views. So further work building out those things, which consults with the community and reflects their views, will be necessary to improve the overall situation.

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

Yes, but as noted in the previous questions response by the nature of being principles they are quite broad and there will be a lot of room for interpretation in the application of these principles. Where things will become less clear without specific AHPRA actions.

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

One important thing that is missing from these principles is clarity over what regulatory relationship there is between AHPRA and the various Boards. Currently it only addresses the regulation of practitioners by AHPRA. I believe there should be a clear mandate for AHPRA to not only regulate and penalize practitioners who do the wrong thing, but also Boards who failure to properly manage those practitioners lead to the problem in the first place. The Chiropractic Board in particular seems to be one that I hear about failing in its duty to manage chiropractors who are doing the wrong thing and there should be regulatory penalty for that systematic failure.

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

This is a good start, but it is only the first step to making sure that health practitioners (esp 'alt health' ones) are regulated to the high standards that community expects i.e. that services being provisioned are ones that will improve health and are based on strong evidence.