



Aboriginal and Torres Strait
Islander health practice
Chinese medicine
Chiropractic
Dental
Medical
Medical radiation practice
Nursing and Midwifery
Occupational therapy
Optometry
Osteopathy
Paramedicine
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

Q13.

Guidelines for mandatory notifications: public consultation

National Boards and the Australian Health Practitioner Regulation Agency (AHPRA) are seeking feedback about the revised *Guidelines for mandatory notifications*.

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the revised guidelines.

Q23.

Privacy

Your response will be anonymous unless you choose to provide your name and/or the name of your organisation.

Privacy notice

This consultation is being conducted by AHPRA and is hosted on a third-party website, provided by Qualtrics. The information collected will be used by AHPRA to evaluate the revised guidelines. The information will be handled in accordance with the privacy policies of AHPRA accessible [here](#) and Qualtrics [here](#).

Contact.

Contact details

We may contact you about your response.

Please write your name and contact details.

(Skip if you wish to be anonymous)

Q25.

Publication of responses

National Boards and AHPRA publish responses at their discretion. We generally publish responses on our websites to encourage discussion and inform the community and stakeholders.

We will not publish responses that contain offensive or defamatory comments or which are outside the scope of the consultation. Before publication, we may remove personally-identifying information, including contact details.

We can accept responses made in confidence. These responses will not be published. Responses may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential response will be determined in accordance with the Freedom of Information Act 1982 (Cth), which has provisions to protect personal information and information given in confidence.

You must let us know if you do **not** want us to publish your responses.

Published responses will include the names (if provided) of the individuals and/or the organisations that made the response.

Q24. Publication of responses

Please select the box below if you do **not** want your response to be published.

Please do **not** publish my response

Q15. About your response

Q23. Are you responding on behalf of an organisation?

- Yes
 No

Q24. Which of the following best describes your organisation?

- Health services provider
 Professional indemnity insurer
 Legal services provider
 Professional body (e.g. College or association)
 Education provider

Regulator

Government

Other

Q22. Please write the name of your organisation.

University of Wollongong

Q17.

Which of the following best describes you?

This question was not displayed to the respondent.

Q19.

Which of the following health profession/s are you registered in, in Australia?

You may select more than one answer

This question was not displayed to the respondent.

Q35.

Before you answer questions about the guidelines

Please ensure you have read the [public consultation papers](#) before providing feedback as the questions are specific to the revised guidelines for mandatory notifications.

The following questions will help us to gather feedback about the revised guidelines.

Q9.

How easy is it to find specific information in the revised guidelines?

Easy. The document is short and direct on the matters discussed.

Q10.

How relevant is the content of the revised guidelines?

Very relevant.

Q12.

Please describe any content that needs to be changed or deleted in the revised guidelines.

The University has some suggestions on providing more detail on how education providers should manage the interface between their obligations and those of registered practitioners.

Q14.

Should some of the content be moved out of the revised guidelines to be published on the website instead?

Yes

No

Q40.

If yes, please describe what should be moved and your reasons why.

References to the National Law (extracts). These may date quickly and are readily accessible anyway.

Q22.

How helpful is the structure of the revised guidelines?

Helpful. The explanation of factors and the reporting workflow in particular are helpful.

Q24. Do the revised guidelines clearly explain when a mandatory notification is required and when it is not?

Yes

No

Q31. Please explain your answer.

This aspect is clear. The high standard for judging what is an impairment is set out clearly.

Q32. Are the flow charts and diagrams helpful?

Yes

No

Q15.

Please explain your answer.

Best aspects of the guideline

Q33. Are the risk factor consideration charts helpful?

- Yes
 No

Q34.
Please explain your answer.

Q29.
Are the examples in the revised guidelines helpful?

- Yes
 No

Q36.
Please explain your answer.

There is only one example in the guideline on health students (on which I am commenting).

Q16. Should there be separate guidelines for mandatory notifications about students or should the information be included in guidelines about practitioners and students (but as a separate section)?

- Separate **guidelines** about students
 Separate **section** about students

Q39.
Please explain your answer.

From an education provider's perspective separate guidelines are clear and helpful.

Q30.

The revised guidelines explain that it is not an offence to fail to make a mandatory notification when required, but a National Board may take disciplinary action in this situation.

Is this made clear in the revised guidelines?

- Yes
 No

Q37.

Please explain your answer.

Q27.

Is there anything that needs to be added to the revised guidelines?

The following matters would be helpful - guidance on what an education provider's processes and procedures should cover: What registered practitioners who are also employees of education providers should do when confronted with evidence of a possible notifiable impairment (e.g. inform their employee / notify / do both / seek advice) How an education provider satisfies itself that the relevant threshold for reporting has been reached. The importance of having thorough but prompt processes for education providers to determine if a notification should be made. The value of incorporating the table on page 8 (health students guideline) to assist in decision making. The right of an employee who is also a registered practitioner to make a notification The need for employees who are also registered practitioners to make clear, in the event of making a notification, that their notification is in a personal capacity. The importance of registered practitioners in this circumstance informing the education provider they have made a notification (otherwise the student will be at risk of being blindsided by advice from AHPRA, and may need advice and support). How to manage the issue of the exemption from notification where a provider or a practitioner reasonably believe that someone else has already made a notification

Q17. It is proposed that the guidelines will be reviewed every five years, or earlier if required.

Is this reasonable?

- Yes
 No

Q38.

Please explain your answer.

Q24.

Please describe anything else the National Boards should consider in the review of the guidelines.

Q31.

Please add any other comments or suggestions for the revised guidelines.

Useful document.

Q27.

Thank you!

Thank you for participating in the consultation.

Your answers will be used by the National Boards and AHPRA to improve the *Guidelines for mandatory notifications*.