



29 April 2021

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Senate Standing Committees on Community Affairs  
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Canberra ACT 2600

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**Inquiry into Administration of Registration and Notifications by the Australian Health Practitioner Regulation Agency and Related Entities Under the Health Practitioner Regulation National Law**

The **Australian Council of Deans of Health Sciences (ACDHS)** welcomes the opportunity to provide input to the Senate Community Affairs References Committee Inquiry into Administration of Registration and Notifications by the Australian Health Practitioner Regulation Agency and Related Entities Under the Health Practitioner Regulation National Law.

ACDHS is the peak representative body of the 29 Australian universities that provide pre-professional education in the allied health sciences. The Council adopts a whole of health system perspective and considers the development of an innovative and sustainable health workforce will best position Australia to address present and emerging health care demands – both domestically and internationally.

ACDHS members considered both strategic and operational perspectives in developing its response to this Inquiry. Strategically, producing the health workforce of the future is a key focus for ACDHS members. Operationally, the Inquiry provides an opportunity to address issues of efficiency and responsiveness as it relates to administration of registration and notifications by the Australian Health Practitioner Regulation Agency and related entities under the Health Practitioner Regulation National Law, with specific reference to

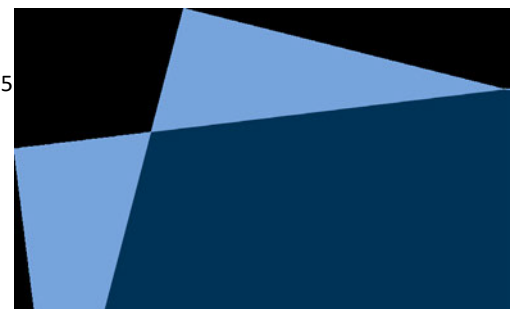
*(e) the role of universities and other education providers in the registration of students undertaking an approved program of study or clinical training in a health profession.*

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The student registration process is undertaken in by the Australian Health Practitioner Regulation Agency (AHPRA) with the University providing notification to AHPRA following enrolment in the program, ie in Year 1. ACDHS members report that it is a simple process of populating the template provided by AHPRA twice a year post census (March and August). However, we question whether student registration needs to occur in Year 1 of the program. Clinical placement providers require students to be registered with AHPRA. We support the intent of registration is to establish a mechanism that ensures public confidence in health practitioners, including students, as to fitness to practice. With allied health course clinical placements normally occurring from Years 2 onwards mandating data be collected in Year 1 may be adding unnecessary administrative burden at a peak time for universities.

Once student data has been sent to AHPRA education providers are required to notify their students that they have been successfully added to the Student Register as confirmed by AHPRA.

ACDHS considers the development of a health workforce that ensures public safety integral to a first-class health system. As educators we take seriously the capacity of students to practice safely while on clinical placement. ACDHS contributed to the development of *AHPRA's Guidelines: Mandatory Notifications about Registered Students (2020)*. This document provides comprehensive guidance for education providers and health service providers about notifications. A mandatory notification about a student can only be triggered by concerns about impairment. The National Law defines 'impairment' as 'a physical or mental impairment, disability, condition or disorder (including substance abuse or dependence) that detrimentally affects or is likely to detrimentally affect the student's capacity to carry out clinical training. ACDHS member universities provide extensive support for students with impairments undertaking clinical placements through a range of internal processes. Further, students are expected to abide by university Codes of Student Conduct and clinical facilitators/supervisors are trained to raise any concerns over a student with the course coordinator. That said, a potential gap in the system is when students transfer from one university to another, often without knowing there had been fitness to practice issues in the original university. That capacity for universities to access AHPRA data when accepting transfers would be helpful.

We acknowledge that AHPRA has a responsibility to protect the public by ensuring that health practitioners who are suitably trained and qualified practice in a safe and ethical manner. We look forward to assisting the Agency in ensuring safe clinical training while at the same time supporting access and equality for students. Should you have any further queries please do not hesitate to contact me at [secretariat@acdhs.edu.au](mailto:secretariat@acdhs.edu.au)

Yours sincerely

Jen Coulls  
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