

The Secretary
Senate Community Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600
Email: community.affairs.sen@aph.gov.au.

28 April 2009

INQUIRY INTO NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR DOCTORS AND OTHER HEALTH WORKERS

The National Coalition of Public Pathology (NCOPP) makes this submission to the Senate Community Affairs Committee Inquiry into the design of the national registration and accreditation scheme for doctors and other health workers.

1. About Us

NCOPP is the organisation that represents the interests and values of public pathology services in Australia. Our members are the major publicly owned and operated pathology services in each State and Territory. They provide comprehensive diagnostic and consultative services to general practitioners (GPs), medical specialists, other clinicians and their patients in Australia's public hospitals and some private hospitals, in community care settings and in the wider community across urban, rural and remote parts of Australia.

Members provide routine and complex testing, health protection services, teaching at undergraduate and post graduate levels, training of pathologists, other clinicians and medical scientists, and research. They take leading roles in many aspects of the clinical governance of Australia's public hospitals and health services. Further information about NCOPP is available at our website at www.ncopp.org.au

2. General Comments

NCOPP supports a national registration scheme for doctors and other health workers to assure public safety and quality of care, promote public confidence and facilitate movement of health workers and delivery of services (e.g. pathology services) across jurisdictional boundaries. NCOPP considers that accreditation and registration should be linked but managed as independent functions for good governance purposes, based on the separation of powers principle.

The key matter that NCOPP wishes to highlight to the Inquiry is the lack of a statutory registration or licensing scheme for medical laboratory scientists in Australia in any State or Territory.

3. Medical Laboratory Scientists as a Health Profession

Provision of high quality pathology services relies on a team of professionals working closely together including pathologists, medical laboratory scientists, technicians and other support staff. Pathology is a clinical knowledge service that supports medical practitioners and other clinicians by providing information and expert medical opinion to inform appropriate, timely diagnosis and management of a patient.

The Australian situation for medical laboratory scientists contrasts with the requirements that apply in comparable countries. In New Zealand and the United Kingdom, there are national registration processes. Certification for provincial licensure is in place in most Canadian provinces and, in the USA, registration or licensing schemes operate in some States and is being pursued in others.

Medical laboratory scientists are an important health profession but they are often ignored when Australia's health workforce is considered. Instead, the focus tends to be on health workers with direct patient contact and those who work behind the scenes in the back rooms like medical laboratory scientists are often overlooked.

Moreover, like other areas of health care, pathology is experiencing significant workforce shortages, especially of pathologists and medical laboratory scientists. A November 2007 National Workshop on Patient Safety and Quality in Pathology found that workforce shortages are a critical threat to the safety and quality of Australia's world class pathology system¹. The problems and pressures facing the pathology workforce are highlighted in a subsequent report². The fragmented approach to the education and training of medical laboratory scientists and lack of a national registration or licensing scheme were identified as key concerns.

4. Way Forward

NCOPP considers that an improved and national approach to Australia's medical laboratory scientist workforce is required. Work is under way through the Pathology Associations Council (PAC) to develop a national workforce improvement framework for medical laboratory scientists including consideration of national registration. PAC brings together representatives of the various organisations that are involved in pathology service delivery, with a particular emphasis on professional issues such as workforce, training, professional development, quality and safety. PAC's submission to the National Health and Hospitals Reform Commission (NHHRC) gives more information about this work³.

NCOPP notes the processes proposed for including other health professions like medical laboratory scientists under the national registration scheme, with protecting the public interest the overriding principle for determining regulation via national registration and accreditation. The onus is on the medical laboratory scientist profession to demonstrate that they meet the criteria and to develop a nationally-consistent registration proposal for consideration by the Ministerial Council.

Thank you for the opportunity to make a submission to the Inquiry. Please contact Penny Rogers, our Chief Executive Officer, on 02 6247 9310 if you require any further information.

Yours sincerely



A/PROF. ROGER D WILSON
President, NCOPP

¹ Legg & Associates (2008) *Report for the National Workshop on Safety and Quality in Pathology – held in Canberra, 28 November 2007*. A Report for the Australian Department of Health and Ageing, Canberra, January 2008.

² Legg & Associates (2008) *The Australian Pathology Workforce Crisis*. A Report Prepared for the Australian Department of Health and Ageing Diagnostic Services Branch, Canberra, October 2008.

³ Royal College of Pathologists of Australasia – Pathology Associations Committee Submission to NHHRC, 22 August 2008. Available at the NHHRC website at www.nhhrc.org.au under Submissions, no. 161.