



Submission to the Aboriginal and Torres Strait Islander Health Practice Board of Australia on changes to the registration of Aboriginal and/or Torres Strait Islander health practitioners

RWAV works to provide sustainable health workforce solutions for disadvantaged communities, particularly rural, remote and Aboriginal communities. RWAV recruits general practitioners and health professionals from around Australia and internationally. Programs and services available include re-location and placement support services, facilitating access to professional development, marketing of general practice, research and policy advice.

In particular, RWAV Aboriginal Health Support Managers are involved in the recruitment and support of General Practitioners into Aboriginal Community Controlled Health Services, along with broader Indigenous workforce development activities such as cultural awareness training, management of the Medical Specialist Outreach Assistance Program (Indigenous Chronic Disease), supporting ACCHS with funding submissions, and linking ACCHS with local stakeholders to promote collaboration.

Recommendations:

1. Draft registration standard: Continuing Professional Development

RWAV supports the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to Continuing Professional Development (CPD).

- Twenty hours per annum of CPD is a reasonable expectation, and given the flexibility surrounding formal and informal CPD arrangements, should not create an issue for the re-registration of Aboriginal Health Workers.

2. Draft registration standard: Criminal History

It is outside RWAV's jurisdiction to comment on the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to criminal history.

3. Draft registration standard: English language skills

RWAV considers attainment of the proposed qualification set out in the “Eligibility for Registration Standard” to be sufficient as a demonstration of English Language Proficiency, and that no further requirement is necessary.

RWAV notes that the standard proficiency qualification does not acknowledge the extended language skills of many Aboriginal and Torres Strait Islander Health Workers practising outside of Victoria, who primarily speak the native Indigenous languages used in these areas (with English as a second, third, or even latter language).

4. Draft registration standard: Professional Indemnity Insurance

RWAV generally supports the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to Professional Indemnity Insurance (PII).

RWAV notes that requiring Aboriginal and Torres Strait Islander Health Workers to provide a letter from their employer stating that they are covered by PII may present issues for those health workers seeking registration who are not yet employed, and who will be seeking coverage by their future employer rather than holding an individual PII. Instead, this could be addressed by requiring Aboriginal and Torres Strait Islander Health Workers to provide a declaration stating that appropriate PII arrangements are, or will be, in place throughout their term of practice. If the worker is subsequently employed, they would then be obligated to provide their employers PII policy number to the Board upon commencement.

5. Draft registration standard: Recency of practice

With regard to the clinical assessment required of practitioners who have not practised in the profession for the previous three to five years; RWAV believes this assessment should be accessible to Aboriginal and Torres Strait Islander Health Workers and therefore available at minimal cost.

- Given that the cost to health practitioners for similar clinical assessments can be significant — for example, the PESCI costs \$1650 for International Medical Graduates to undertake — this could create barriers for Aboriginal and Torres Strait Islander Health Workers to practice, and limit the ability of the health sector to recruit workers in this domain.

6. Statement of assessment against AHPRA’s Procedures for Development of Registration Standards for the mandatory registration standards

It is outside RWAV’s jurisdiction to comment on the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to AHPRA’s procedures for development of registration standards.

7. Grandparenting registration standard

RWAV supports the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to grandparenting registration standard.

As appropriate evidence to verify clinical practice undertaken by a practitioner over the five years of practice outlined in the standard, RWAV recommends the use of a form similar to that used in the Royal Australian College of General Practitioners (RACGP) *Assessment of Overseas General Practice Experience*. The form could outline:

- Aboriginal and Torres Strait Islander Health Workers' roles between 1 July 2002 and 30 June 2012; and
- the specific skills these roles encompassed in line with the Aboriginal and Torres Strait Islander Health Workers scope of practice.

These skills could be documented together, as opposed to RACGP's current requirement to document each against the domains of general practice for each role undertaken during the regulatory period.

8. Statement of assessment against AHPRA's Procedures for Development of Registration Standards — Grandparenting registration standard

It is outside RWAV's jurisdiction to comment on the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to AHPRA's procedures for development of registration standards — grandparenting registration standard.

9. Statement of assessment against AHPRA's Procedures for Development of Registration Standards — Aboriginal and Torres Strait Islander standard

Considering workforce demand, and the length of time it would take to verify that a practitioner is from Aboriginal and/or Torres Strait Islander descent, it would be more appropriate to request this formal verification within the first six months of employment rather than pre-commencement.

RWAV also notes that, as many Indigenous people self-identify as both Aboriginal and Torres Strait Islander, the preferred terminology would be "Aboriginal *and/or* Torres Strait Islander standard".

10. Eligibility for registration standard

It is outside RWAV's jurisdiction to comment on the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to the eligibility for registration standard.

11. Statement of assessment against AHPRA's Procedures for Development of Registration Standards — *Eligibility for registration standard*

It is outside RWAV's jurisdiction to comment on the proposed requirements of the Aboriginal and Torres Strait Islander Health Practice Board with respect to AHPRA's procedures for development of registration standards — eligibility for registration standard.

RWAV welcomes the opportunity to provide comment and would be pleased to speak to our submission.

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