

Ahpra & National Boards

Email: regulatorygovernance@ahpra.gov.au

Re: Public consultation on revised Regulatory principles for the National Scheme

Thank you for the opportunity to provide feedback through the Ahpra consultation on revised regulatory principles for the National Scheme.

HCCA is a health promotion agency and the peak consumer advocacy organisation in the Canberra region. HCCA provides a voice for consumers on local health issues and provides opportunities for health care consumers to participate in all levels of health service planning, policy development and decision making. For input this consultation, HCCA sought advice from our Health Policy Advisory Committee. Overall, members were relatively satisfied with the improvements that had been made to the framing of the AHPRA regulatory principles.

There was some more detailed discussion specifically about point 6 (from p7 of the consultation paper):

The primary purpose of our regulatory response is to protect the public and improve the standard of practice of registered health practitioners. Our responses are designed to not punish practitioners. When deciding on regulatory responses we:

- *give at least equal weight to the expectations of the public as well as professional peers*
- *consider the importance of maintaining community confidence in regulated health professions, and*
- *consider the need to effectively deter other practitioners from engaging in similar conduct.*

We provide the following feedback:

- While consumers recognise that it can be difficult to balance public expectations with that of professional peers, it is important to take both into account.
- Consumers stressed the need to undertake responses that reflect a restorative and conciliatory approach that works towards quality improvement across our health professions.

Health Care Consumers' Association

100 Maitland Street, HACKETT ACT 2602 Phone:02 6230 7800

ABN: 59 698 548 902 Email: adminofficer@hcca.org.au

hcca.org.au |  [HCCA.ACT](https://www.facebook.com/HCCA.ACT) |  [@HealthCanberra](https://twitter.com/HealthCanberra)

- Where processes become adversarial at an early stage, it makes it difficult for patients who have an on-going need for care to have a continuing relationship with a practitioner who they are raising concerns about. It can also affect their relationship with other treatment health professionals.
- A restorative approach, based on open disclosure and sensitive responses to concerns raised by patients and carers can often serve to identify better the issues of concern at an early stage, and to better identify what, if any performance concerns might need to be addressed to prevent any recurrence of preventable harm.
- There was strong agreement that such regulatory performance cases should not be dealt with in a punitive way.

In light of this feedback, we propose the following alternate wording for point 6 of the principles (p7 of the consultation document):

The primary purpose of our regulatory response is to protect the public and improve the standard of practice of registered health practitioners. When deciding on regulatory responses we:

- *consider the vital importance of maintaining community confidence in regulated health professions through transparent decision-making processes and good communication by the regulator with those involved, and*
- *give at least equal weight to the expectations of the public as well as professional peers while also respectfully listening to and seeking to understand the concerns of the consumer or carer.*

Our responses are not designed to punish practitioners but stop repeated preventable harm and work towards quality improvement.

We hope that our comments are useful in helping ensure that Ahpra supports our health system in delivering high quality, safe and consumer-centred care. HCCA would be happy to discuss any of our comments further if needed, please feel free to get in touch.

Darlene Cox
Executive Director
darlenecox@hcca.org.au

Kathryn Briant
Policy Officer
kathrynbriant@hcca.org.au