

I thank AHPRA for the opportunity to comment on the draft guidelines for informing a National Board about where you practise.

While the majority of the information seems logical and in the public interest, I cannot see the logic in the requirement of naming all other parties who are unrelated in a business sense who happen to work in the same premises. I also feel there has not been a satisfactory argument put forward in the guidelines to justify this.

I believe this places an unnecessary burden on the practitioner who has been asked to provide their practice information and see no justification for mentioning the names of unrelated parties for AHPRA to note.

The example I would give would be a large consulting suite which may have 20-30 different practitioners in the building in separate suites, but all contribute to common cleaning, strata arrangements or a front receptionist. The example would fall in section 132[4][a] by my reading of the draft guidelines, and require a great deal of work to identify all registered professionals working in the building and if, for example, a podiatrist was asked for practice information, why does AHPRA need to know about the psychologist or occupational therapist in the 'shared premises'? What AHPRA will do with this information is not dealt with clearly in the draft guidelines. There could be a perception of taint of practitioners in AHPRA's eyes by simply being in the same complex due to the ambiguity in the wording of the guidelines which in my opinion, should be addressed.

Kind regards

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