

5 December 2011

AHPRA

Email: practice.consultation@ahpra.gov.au

Dear Sir / Madam

**RE: Definition of Practice consultation paper**

Thank you for providing The Royal College of Pathologists of Australasia (the College) an extension of time for submission on the above consultation paper. Following are the College's comments to the questions raised in the consultation paper:

**Question 1:** Are there any other factors that the National Boards should consider when advising whether or not a person needs to be registered? **No**

**Question 2:** Do you support this statement? Please explain your views. **Yes**

**Question 3:** Do you support this statement? Please explain your views. **Yes**

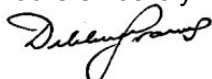
**Question 4:** Do you believe that health practitioners in non-clinical roles / non-patient-client care roles as described above are "practising" the profession? Please state and explain your views about whether they should be registered and if so for which roles? **Yes and Yes**

**Question 5:** For which of the following roles in education, training and assessment should health professionals be registered?

- Settings which involve patients/clients in which care is being delivered ie when the education or training role has a direct impact on care, such as when students or trainees are providing care under the direction, instruction or supervision of another practitioner. **Yes**
- Settings which involve patients/ clients to demonstrate examination or consulting technique but not the delivery of care. **No**
- Settings which involve simulated patients/clients. **No**
- Settings in which there are no patients/clients present. **No**

The College is supportive of Option 2 – Change the definition to emphasis safe and effective delivery of health care.

Yours sincerely



Dr Debra Graves

**Chief Executive Officer**