



7 October 2013

Australian Health Practitioner Regulation Agency
GPO Box 9958
MELBOURNE VIC 3001

Email: criminalhistoryconsult@ahpra.gov.au

Re: International Criminal History Checking

The Office of the Health Services Commissioner (OHSC) welcomes the opportunity to respond to the Australian Health Practitioner Regulation Agency's (AHPRA) public consultation on international criminal history checking. As advised on 4 June 2013, we support Option 5 as the best option as it aligns most closely with the objectives of national registration and accreditation while minimising administrative costs to AHPRA.

Objective (d) under the National Registration and Accreditation Scheme seeks to '*facilitate the rigorous and responsive assessment of overseas-trained health practitioners*'. By allowing applications for registration to proceed on the basis of self-declaration, followed by comprehensive international criminal history checking post-registration, both aspects of this objective are achieved. There is timely processing coupled with a rigorous approach. However, as stated in the consultation paper, there is a risk that an applicant with an international criminal history may be inappropriately registered before the result of the international criminal history check is known which has the potential of risking the safety and quality of care provided to patients. Therefore, it is critical that any external provider engaged to conduct international criminal history checks does so expediently and that such a requirement is incorporated in the tender process.

When an applicant or registrant requires an international criminal check, the OHSC recommends that a check be undertaken in each country where an applicant has lived for three months or more (rather than six months), to minimise the risk that an applicant with a criminal history is inappropriately registered.

Should you wish to discuss this submission further, please do not hesitate to contact me on [REDACTED].

Yours sincerely

Dr Grant Davies
Acting Health Services Commissioner