



# Submission

## Guidelines for mandatory notifications

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The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) welcomes the opportunity to provide feedback to the National Boards in the National Registration and Accreditation Scheme (the Boards) on the *Guidelines for mandatory notifications*.

The College supports option two, *Proposed revised guidelines*, for the following reasons:

- Clarity relating to mandatory reporting and the differences between registered practitioners and students is positive.
- As the law evolves to require regular general practitioner visits under the professional, performance framework, the mandatory notification process provides transparency. Changes may create uncertainty and some anxiety for doctors; RANZCOG welcomes Australian Health Practitioner Regulation Agency (AHPRA) creating explanatory information and videos similar to those currently on the AHPRA website to assist in communicating improvements in February 2020. It is important that AHPRA supports medical practitioners and students as best it can.

Overall, RANZCOG believes the guidelines now provide a clearer framework to apply the law and the College supports the areas of what conduct must be reported, when to make a mandatory notification, when a notification is not required, who must make a notification, who it must be made about and the consequences of not making a notification.

The College is supportive of the developments to the guidelines which help communicate methods which constitute appropriate treatment, remedy or intervention and where issues do not warrant a mandatory notification.

As Continuing Professional Development (CPD) and educational programs which require engagement from medical practitioners evolve to include performance, it is timely to clarify and ensure separation between professional performance and compliance with educational programs run by educational providers.

The College would like to register our preference to have a treating practitioner exemption for the whole country in the future, as is the circumstance in Western Australia.

### **Specific feedback**

5. *How helpful is the structure of the draft guidelines?*
6. *Do the draft guidelines clearly explain when a mandatory report is required and when it is not?*
7. *Are the flow charts helpful?*

The structure, content and use of flowcharts is positive.

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*8. Are the risk factor consideration charts helpful?*

The risk factor consideration charts are helpful.

*9. Are the examples in the draft guidelines helpful? If not, how can they be improved?*

The examples are useful to provide details of the nature of issues which are required to be reported versus those note.

*10. Should there be a separate Guideline for mandatory notifications about students or should the information be integrated within a single Guideline (but as a separate section)?*

Separate guidelines for students could be more discoverable.

*11. The draft guidelines explain that it is not an offence to fail to make a mandatory notification when required, but a National Board may take disciplinary action in this situation. Is this clear?*

It is clear that it is not an offence to fail to make a mandatory notification when required, but a National Board may take disciplinary action.

Please do not hesitate to contact [REDACTED] Director of Education & Training, should you wish to discuss further.

Yours sincerely,

[REDACTED]

[REDACTED]  
**President**