



1 NOVEMBER 2019

File Ref: TRIM File Reference

AHPRA

Level 8, 111 Bourke Street,

MELBOURNE, VIC 3000.

To the Executive Officer, Medical:

**Re: Public consultation on Guidelines for registered health practitioners and students in relation to blood borne viruses**

Ambulance Victoria (AV) has given due consideration to the above consultation. AV and our Paramedic workforce are committed to undertaking and ensuring the general public is protected and supports Option two.

Given the potential cost to employers Ambulance Victoria would like to propose that a staged three year approach to support the implementation of these guidelines if Option two were to be adopted. This would allow a time appropriate planning phase for governance to be prepared and timely communication with the workforce.

Please see below the answers to the consultation as requested:

Question:	Ambulance Victoria Response:
1) Are the draft guidelines necessary?	Yes. They define the obligations to comply with the CDNA guidelines. The CDNA guidelines themselves do not do this directly and do not define the practitioner's responsibility to AHPRA.
2) Is the content of the draft guidelines helpful, clear and relevant?	Yes. No amendments are necessary in our view.
3) Is there any content that needs to be changed, added or deleted in the draft guidelines?	Yes. If testing is mandatory at not more than 3 year intervals the practitioner should provide evidence of that testing, albeit the results do not need to be provided to AHPRA.
4) Do you agree with the proposal that the Boards expect registered health practitioners and students to comply with CDNA guidelines? That includes testing requirements set in the CDNA guidelines.	Yes. As an issue of public and practitioner safety the guidelines are well thought out and not overly burdensome.
5) Do you have any other comments on the draft guidelines?	No



If there are any further questions about the letter attached with the responses, AV welcome the opportunity to consult further.

Yours sincerely

**Simon Thomson**

A/Director Operational Capability

