

Patient and Consumer Health and Safety Impact Assessment

December 2021

Medical Board of Australia – revised registration standard for *Endorsement of registration for acupuncture for registered medical practitioners*

Assessment purpose

The Medical Board of Australia's Patient and Consumer Health and Safety Impact Assessment¹ explains the potential impact of a proposed registration standard, code or guideline on the health and safety of the public, vulnerable members of the community and the Aboriginal and Torres Strait Islander Peoples.

The four key components considered in the Assessment are:

1. The potential impact of the revised registration standard for *Endorsement of registration for acupuncture for registered medical practitioners* on the health and safety of patients, particularly vulnerable members of the community, including approaches to mitigate any potential negative or unintended effects
2. The potential impact of the registration standard on the health and safety of Aboriginal and Torres Strait Islander Peoples including approaches to mitigate any potential negative or unintended effects
3. Engagement with patients and consumers, particularly vulnerable members of the community, about proposed changes to the registration standard prior to its approval by the Australian Health Workforce Ministerial Council (the Ministerial Council)
4. Engagement with Aboriginal and Torres Strait Islander Peoples about the proposed changes to the registration standard prior to its approval by the Ministerial Council.

The National Boards' Health and Safety Impact Assessment aligns with the National Scheme's [Aboriginal and Torres Strait Islander Cultural Health and Safety Strategy 2020-2025](#), the [NRAS Engagement Strategy 2020-25](#), the [NRAS Strategy 2020-25](#) and reflects key aspects of the revised consultation process in the [AManC Procedures for developing registration standards, codes and guidelines and accreditation standards](#).

¹ This assessment has been developed by Ahpra and the National Boards in accordance with section 25(c) and 35(c) of the *Health Practitioner Regulation National Law* as in force in each state and territory (the National Law). Section 25(c) requires AHPRA to establish procedures for ensuring that the National Registration and Accreditation Scheme (the National Scheme) operates in accordance with good regulatory practice. Section 35(c) assigns the National Boards functions to develop or approve standards, codes and guidelines for the health profession including the development of registration standards for approval by the Ministerial Council and that provide guidance to health practitioners registered in the profession. Section 40 of the National Law requires National Boards to ensure that there is wide-ranging consultation during the development of a registration standard, code, or guideline.

Below is our assessment of the impact of the approved revised registration standard *Endorsement of registration for acupuncture for registered medical practitioners* on the health and safety of patients, particularly vulnerable members of the community, and Aboriginal and Torres Strait Islander Peoples.

1. How will the revised standard impact on patient health and safety, particularly vulnerable members of the community? What are the actions that have been taken to address or prevent this?

The Medical Board of Australia's (the Board's) registration standard has been approved by the Ministerial Council comprising Ministers of Health from each State and Territory and the Commonwealth.

Before the Board submitted the registration standard to the Ministerial Council for approval, the Board conducted wide-ranging public consultation with a range of stakeholders including consumer organisations, patient safety bodies, Aboriginal and Torres Strait Islander groups, other National Health Practitioner Boards, Health Complaints Entities and the medical profession to ensure the Board's proposed changes to the standard did not have any adverse impacts on patient and consumer safety, particularly for vulnerable members of the community.

The approved registration standard is an updated version of the prior registration standard implemented in 2012. The standard was updated to ensure its continued relevance and maintenance of public safety standards. The updated standard includes minor changes to:

- a. remove outdated information
- b. ensure requirements for continuing professional development (CPD) for medical practitioners whose registration is endorsed for acupuncture align with the Board's current approved registration standard for CPD, and
- c. ensure that medical practitioners who have allowed their registration to lapse can reapply for endorsement of registration for acupuncture if they previously held endorsement under the National Law through grandfathering arrangements.

The registration standard has not substantially changed and therefore the Board does not believe the registration standard will have a negative impact on patient and consumer health and safety, particularly for vulnerable members of the community.

The Board's standard supports the National Registration and Accreditation Scheme's key objective of protecting the public by ensuring only health practitioners who are suitably trained and qualified to practise in a competent and ethical manner are registered. The registration supports that objective by ensuring that only registered medical practitioners who are appropriately qualified can have their registration endorsed for acupuncture.

The Board carefully considered stakeholder feedback to identify any unintended impacts (including potential negative impacts) of its proposed changes to the standard. Most stakeholders supported the proposed changes to the standard and though Chinese medicine stakeholders raised concerns that the accreditation and education standards for acupuncture for medical practitioners and Chinese medicine practitioners are not the same, the Board noted that training in acupuncture for medical practitioners builds on medical training. Only qualified medical practitioners with general and/or specialist registration can be endorsed for acupuncture. The approved training in acupuncture is also accredited by the Australian Medical Council, the accreditation authority for the medical profession.

Endorsed medical practitioners are required to participate in continuing professional development in acupuncture to ensure they keep their knowledge and skills up to date. Stakeholder submissions did not provide any evidence of the risks of harm to patients and consumers, particularly vulnerable members of the community from medical practitioners practising acupuncture.

Our engagement through consultation has assisted us to meet our responsibilities to protect patient safety and health care quality. The Board has [published](#) stakeholder submissions where the stakeholder did not request confidentiality.

2. How will the registration standard impact on Aboriginal and Torres Strait Islander Peoples? What are the actions that have been taken to address or prevent this?

The Board does not believe the registration standard will have a negative impact for Aboriginal and Torres Strait Islander Peoples. Only registered medical practitioners with general and/or specialist registration can be granted endorsement of registration for acupuncture.

Aboriginal and Torres Strait Islander groups consulted on proposed changes prior to the standard being submitted for approval to the Ministerial Council, did not provide any feedback about adverse impacts for Aboriginal and Torres Strait Islander Peoples.

The Board is committed to the National Scheme's [Aboriginal and Torres Strait Islander Cultural Health and Safety Strategy 2020-2025](#) which focuses on achieving patient safety for Aboriginal and Torres Strait Islander Peoples as the norm, and the inextricably linked elements of clinical and [cultural safety](#). All registered medical practitioners are subject to the Board's registration standards, codes and guidelines. The Board's code of conduct requires all registered medical practitioners to provide culturally safe care, particularly for Aboriginal and Torres Strait Islander Peoples.

3. How will the impact of the registration standard be actively monitored and evaluated?

The Board has procedures for regularly reviewing standards, codes and guidelines. The Board will review the standard at least every five years.

However, the Board may review the standard earlier, in response to any issues which arise or new evidence which emerges to ensure the standard's continued relevance, workability and maintenance of public safety standards. In particular, the Board will review the registration standard earlier if unintended consequences on the health and safety of the public, vulnerable members of the community and Aboriginal and Torres Strait Islander Peoples were to arise.