

Ms S Facoor  
Executive Officer  
Nursing and Midwifery Board of Australia  
AHPRA  
GPO Box 9958  
MELBOURNE VIC 3001

Dear Ms Facoor

**Re: Nursing & Midwifery Board of Australia Public consultation paper,  
International criminal history checking**

Thank you for the opportunity to provide feedback on the options for refining international criminal history checks used by the Australian Health Practitioner Regulation Agency (AHPRA) in assessing applications for registration for the 14 health professions regulated under the Health Practitioner National Law, as in force in each state and territory (National Law).

I note that the National Boards received 68 external submissions from public consultation in the first round, with feedback about the preferred option mixed. I also note that as a consequence of this, an additional option (Option 5) has been identified after a period of consultation which reconciles the competing views expressed regarding the other four options.

I have no objections to supporting Option 5 outlined within the international criminal history checking public consultation paper. I support this option as it establishes a similar process for checking international criminal histories, to the current processes for checking domestic criminal histories through Crimtrac. It will also meet the requirements of balancing risk as comprehensive checks will be undertaken where appropriate whilst not imposing unnecessary delays on applicants becoming registered. Option 5 will also incur no additional cost to the National Scheme as costs for the criminal history check will be the responsibility of the applicant with the total cost dependent on the number of countries that need to be checked.

In conclusion I would suggest that AHPRA investigate what the range of costs might be for applicants, as this will be a significant factor in whether the process is reasonable, and what period of time (of living overseas) should be adopted.

Thank you again for the opportunity to provide feedback during this public consultation phase. Should any further information be required, please contact Ms. Jan White, Principal Advisor Midwifery, Nursing and Midwifery Office (NaMO) on [REDACTED] or [REDACTED]

Susan Pearce  
**Chief Nursing and Midwifery Officer, NSW**  
**Adjunct Associate Professor, University of Sydney**