Submission to the National Registration and Accreditation Scheme Review

10 October 2014

Submission from the
Australian Diabetes Educators Association
Thank you for the opportunity for the Australian Diabetes Educators Association to attend a national consultation on the above review.

ADEA is the leading organisation for healthcare professionals with a special interest and expertise in diabetes education and has a strong focus on:

- Actively promoting evidence based diabetes education to ensure optimal health and wellbeing for those affected by, or at risk of, diabetes.
- Setting national standards and developing guidelines for the practice of diabetes education.
- Offering professional development programs and accrediting those developed by other organisations.

ADEA is a national association that has been implementing the ADEA Credentialling Program, a professional recognition and development program to support healthcare professionals providing diabetes education and care. Recognition as an ADEA CDE is intended as an assurance to consumers, employers and other health professionals of a quality assured credential in the practice of diabetes education.

ADEA has a multidisciplinary membership and credentials nurses, dietitians, pharmacists, exercise physiologists and podiatrists. All Credentialled Diabetes Educators (CDEs) are required to maintain their primary professional qualifications. The fact that some of these professions are regulated through NRAS and some are not creates confusion and distortions because of the cross professional practice as Credentialled Diabetes Educators.

The risks to people with diabetes are similar regardless of the primary profession.

For the purposes of this consultation ADEA would like to address the following question which has particular relevance to our organisation and its membership.

**Q6. Should future proposals for professions to be included in the National Scheme continue to require achievement of a threshold based on risk to the public and an associated cost benefit analysis?**

ADEA supports this.

ADEA supports practitioners in the self-regulated professions being regulated through legislative title protection. This will address the public need for safety, and minimise risk with the least administrative impact. Through this model’s protection of title for self-regulating health professions the public can be assured that their treating practitioner has the appropriate qualifications, competency, and meets other credentialling requirements. In addition, transparent risk assessment criteria and agreed threshold levels that are clear to both the existing regulated professions and those professions self-regulating or applying for inclusion under NRAS are essential. This will help to ensure consistency of approach across all health professions in order to effectively ‘protect the public’.

**Q 7. Should the National Law be amended to recognise those professions that provide adequate public protection through other regulatory means?**

As noted in the consultation paper, the National Scheme oversees the safe practice and regulation of more than 618,000 health professionals all over the nation. The objectives of the Scheme are
valuable and have merits for all health professionals, not just those whose health services are viewed as being of a higher risk to public safety.

ADEA believes the National Law be amended to include a description of self-regulating health professions for inclusion under the NRAS. Further ADEA believes that titles of self-regulating professionals should be protected by legislation and that the practitioners be required to meet the standards of practice authorised by the professional organisation. This authorised self-regulation model has potential to provide a high level of safety and quality through the requirement to meet quality standards, rather than relying on adverse events.

Since the inception of the National Regulation and Accreditation Scheme (NRAS) there is a widespread perception within the Australian community that all health professionals are regulated. It has also come to our attention that many health professionals regulated through NRAS do not know that the health professionals with whom they work are self-regulated. The unintended consequence if this is that health professionals from self-regulating disciplines are then treated differently and their competence often questioned.

There is an unspoken recognition of the validity of health professionals who are “in” the scheme and a lesser value attributed to those “outside” the scheme. This is reinforced by the lack of national workforce data for non-scheme members. NRAS members benefit from participation in consistent data collection relating to their membership and workforce. Governments use this consistent data to make policy decisions; therefore health professionals outside of the Scheme will not be included in policy considerations related to health workforce.

There are economies of scale for the administrative processes provided through National Registration. Smaller groups of allied health professionals do not benefit from these and each organisation must develop their own regulatory administration systems, complaints and notification systems, structures and data collection methodologies. The overheads for these administration processes area quite onerous on small organisations and may lead to an ineffective process that does not necessarily provide adequate public accountability and proper management of risk.

Non NRAS members are often discriminated against as many opportunities exist for members of the scheme, eg. Windermere Scholarships that are not available to health professionals outside of the scheme.

Q11. Should there be a single entry point for complaints and notifications in each State and Territory?

Q12. Should performance measures and prescribed timeframes for dealing with complaints and notifications be adopted nationally?

ADEA supports both of these processes within a single entry point for complaints and notifications.

Contact:
Dr Joanne Ramadge
CEO
Australian Diabetes Educators Association
CEO@adea.com.au
02 6287 482