Mr Kim Snowball  
National Registration and Accreditation Scheme Independent Reviewer  
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9th October 2014

Dear Mr Snowball,

Review of the National Registration and Accreditation Scheme for health professionals

Thank you for allowing Exercise & Sports Science Australia (ESSA) the opportunity to provide a submission to the Review of the National Registration and Accreditation Scheme for health professionals.

Summary

The introduction of the National Regulation and Accreditation Scheme (NRAS) has made significant progress toward achieving a nationally consistent framework, protecting the health and safety of those who access health services. However, a major limitation of the scheme is the failure to include all health professionals within the framework.

Approximately 75% of Australian health professionals are not recognised by the NRAS framework. Some of these health professionals are regulated through voluntarily subscribing to their profession’s self-regulating framework, however, a significant proportion of health professionals work external to any formalised regulatory framework and are not subject to meeting standards or requirements of professional practice.

Current Australian self-regulatory arrangements for health professionals are voluntary, and consequently do not capture all professionals working in healthcare. This leaves a gap in the Australian healthcare system in ensuring there is a robust regulatory framework addressing public safety and quality control.

There is also the misconception that health professionals who fall under NRAS are the only quality healthcare professionals. This falsely implies that health professionals who fall outside of NRAS do not have the same level of recognition of qualifications, minimum entry standards, assurance of practice standards, or a code of conduct and ethics.

The National Alliance of Self Regulating Health Professions (NASRHP), operating under the Auspice of the Allied Health Professions Australia (AHPA), is composed of nine allied health professions (including Exercise & Sports Science Australia) which are not described under the NRAS, and is representative of the broader collective of self-regulating health professions in Australia. The core objectives of NASRHP are to:

- seek clarity regarding regulation for their respective professions
- benchmark their self-regulatory environment
- advocate on behalf of the public for an improved health regulatory environment
address the challenges and consequences for the professions and health agencies of the current fragmentation in health practitioner regulation.

The NASRHP contends that to protect the interests and safety of the public a single national authority such as the Australian Health Practitioner Regulation Agency (AHPRA) should be responsible for managing the regulation of all health practitioners. This requires an integrated framework covering the registered professions, authorised self-regulating professions and negative licensing of those practitioners who do not otherwise fit within the regulation processes.

**Recommendations**

**KEY POINT**

The NRAS Bill needs to include self-regulating health professions

Inclusion of self-regulating health professions in the NRAS Bill will:

1) formally recognise self-regulation of health professionals within the Australian healthcare system
2) allow the Government to authorise self-regulation to meet the NASRHP standards
3) reserved/protected title legislation, thus requiring practitioners utilising the protected title to meet standards for practice set by the self-regulating organisation (professional association)

The inclusion of self-regulation into the NRAS framework will not incur significant costs to the system. The professional associations administering the self-registration schemes are covering the majority of the costs.

Incorporating self-regulation into the Bill will be a cost-effective option for the Government in expanding the regulation of health professionals to cover the remaining 75% of healthcare professionals.

**Background on Exercise & Sports Science Australia**

ESSA is the peak organisation in Australia representing and advocating for university trained exercise and sports science professionals.

ESSA provides national and international leadership and advocacy on key issues and supports its professionals and the community by fostering excellence in professional practice, education and training, and research.

ESSA has administered a self-regulating scheme for accredited exercise physiology and accredited sports science since 1996. ESSA is the only professional body in exercise and sports science that can provide the quality control required to regulate the standards of these professions in Australia.

ESSA is a founding member of the National Alliance of Self Regulating Health Professionals.
ESSA has a current membership base of over 4200 professional members located throughout all states and territories of Australia.

Kind regards,

Anita Hobson-Powell
Executive Officer
Exercise & Sports Science Australia