

Public consultation on registration standard: Grandparenting

December 2017

Responses to consultation questions

Please provide your confidential feedback as a Word document by email to paramedicine@ahpra.gov.au by close of business on 8 February 2018.

Stakeholder Details

If you wish to include background information about your organisation please provide this as a separate Word document (not PDF).

Organisation name
State Medical Assistance Pty Ltd ACN 164 973 077
Contact information <i>(please include contact person's name and email address)</i>
Ben Cant, Chief Executive Officer, State Medical Assistance Pty Ltd [REDACTED]

Registration standard: Grandparenting

Please provide your responses to any or all questions in the blank boxes to the right of the question

<p>1. From your perspective, does the proposed standard adequately provide clarity in relation to the possible pathways available in the 'grandparenting' provisions?</p>	<p>It is noted that the proposed registration standard is to apply to those persons who do not hold an "Approved Qualification" or "Accepted Qualification". An Accepted Qualification is defined in the registration standard as "a <i>Diploma of Paramedical Science issued by the Ambulance Service of New South Wales</i>".</p> <p>We submit that there are a number of other registered training organisations that provide the Diploma of Paramedicine which appropriately qualifies participants as paramedic professionals. By limiting the definition of Accepted Qualification to Diplomas issued only by the Ambulance Service of New South Wales, a vast number of paramedic professionals would be prejudiced and would be required to apply for registration under section 311 of the National Law.</p> <p>We submit that this would create an onerous and unfair burden on many paramedic professionals who are authorised to practice as paramedics. It also unfairly restricts paramedics who have obtained nationally recognised accreditation from working in different states without going through an additional recognition process.</p>
<p>2. Are there any state or territory-specific issues or impacts arising from applying the existing standard that you would like to raise with the Board?</p>	<p>As stated above, the restrictive definition of Approved Qualification, would require paramedics with nationally recognised accreditation to apply for registration under section 311 of the National Law. This is despite the fact that section 19A of the <i>Health Services Regulation</i> recognises a paramedic as being suitably qualified if they have completed a nationally accredited course.</p> <p>From an employer perspective, this would make some existing employees ineligible to practice as a paramedic unless registration was obtained in accordance with the standard and may result in the employee being terminated as they are unable to fulfil their role. Alternatively, it creates an onerous burden on employees to go through the process of registration if their Diploma has not been obtained by the Ambulance Service of New South Wales.</p>
<p>3. Is the content of the proposed registration standard helpful, clear and relevant?</p>	<p>We refer to our comments above.</p>

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<p>4. Is there any content that needs to be changed or deleted in the proposed registration standard?</p>	<p>Based on our submission above, we request that the definition of Accepted Qualification is amended to mirror the qualification requirement set out in section 19A of the <i>Health Services Regulation</i>. That is, the definition of Accepted Qualification should be amended to read:</p> <p><i>“Accepted qualification means a nationally recognised Diploma of Paramedicine issued by a Registered Training Organisation”.</i></p> <p>We submit that a further definition of “Registered Training Organisation” is inserted as follows:</p> <p><i>“Registered Training Organisation means an NVR registered training organisation within the meaning of the National Vocational Education and Training Regulator Act 2011 of the Commonwealth.”</i></p> <p>We submit that these definitions will ensure that paramedics that hold a Diploma from a nationally accredited source will not be made subject to the grandparenting registration standard. This will also reduce an unnecessary administrative burden on the Paramedicine Board of Australia from reviewing applications for registration from applicants who satisfy the qualification requirements under the Health Services Act.</p>
<p>5. Is there anything missing that needs to be added to the proposed registration standard?</p>	<p>We refer to our comments above.</p>

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6. Do you have any other comments on the proposed registration standard?

We submit that the proposed definition of Approved Qualification which is more restrictive than the definition contained in the *Health Services Regulation 2013* creates a potential monopolisation of the training offered by Ambulance Services of NSW. The proposed registration standard requires paramedics who have not completed the “Approved Qualification” to apply for registration under the proposed registration standard. This may have the effect of paramedics, who have already obtained qualifications which are acceptable under the *Health Services Regulation 2013*, obtaining additional qualifications from the Ambulance Service of NSW. This creates an additional unnecessary cost on paramedic professionals and creates a monopolisation of the training organisation that can deliver accredited courses.

The proposed registration creates a potential situation of a shortage in registered paramedic professionals if a significant number of paramedic professionals are required to apply for registration under the grandparenting standard. In addition, this has a wide ranging social and financial impact on individuals that may be prevented from working, working reduced hours or working at reduced rates of pay, whilst obtaining registration through grandparenting provisions or undertaking additional qualifications.

The grandparenting registration standard should not have the effect of limiting or reducing the paths of registration when individuals have obtained appropriate national qualifications. As stated above, there is potentially a large number of individuals who may suffer personal and financial consequences if their qualifications (obtained in accordance with the *Health Services Regulation 2013*) are not recognised. This also has an impact on employers seeking to retain employees that meet the registration standards in a market which already suffers from a shortage of qualified individuals.