Public consultation on registration standard: Professional indemnity insurance arrangements

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).*

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| **Organisation name** |
| AHPRA Community Reference Group |
| **Contact information** *(please include contact person’s name and email address)* |
| [content redacted] [content redacted] |

| **Registration standard: Professional indemnity insurance arrangements***Please provide your responses to any or all questions in the blank boxes to the right of the question* |
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| 1. From your perspective, does the proposed standard adequately fulfil the Board’s requirements to set out the requirements for professional indemnity insurance (PII) arrangements for the paramedicine profession?
 | * Members suggest that there should be clarity about someone would be covered if they are no longer practicing, and therefore have no PII, and there is an emergency at which they are present and they act/practice.
* Members suggest to make it clear how a practitioner would provide evidence to the Board (if required by the Board) when they submitted scope of practice to the provider.
* Members agreed with run off cover being maintained.
* Suggestion to make clear what documentation is required to declare that you will not practice the profession unless you have PII arrangements.
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| 1. Is the content and structure of the proposed PII arrangements registration standard helpful, clear, relevant and workable?
 | * The document implies that the amount of insurance cover an independent practitioner requires is the amount of cover the insurance company deems them to need. Members noted that this is giving the insurance company a lot of power and lets them set the standard. Members suggest that something needs to be done to ensure the insurance companies are not over quoting. Under ‘Amount of cover’ it says:*‘…you should ensure that you take out adequate and appropriate insurance or professional indemnity cover. Professional indemnity insurers provide these policies. Insurance brokers or providers are best placed to advise you on what level of cover is adequate and appropriate for your practice.’*
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| 1. Is there any content that needs to be changed or deleted in the proposed PII arrangements registration standard?
 | * Members suggest adding some clarity around how and what type of evidence is required could be useful under background, point 18 (below). Members suggested that it would be more appropriate to say the students ‘must’ be covered by their institutions, to ensure their institutions are doing the right thing. It was unclear whether the institutions are not required by any rules to ensure their students are covered
* *‘Students undertaking clinical training as paramedics should be covered by the insurance of their education provider and hence are excluded from the requirements of this standard.’*
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| 1. Is there anything missing that needs to be added to the proposed PII arrangements registration standard?
 | * The amount of cover is not specified. Other industries require a minimum amount for each and every event plus and overall limit.
* There needs to be a requirement for practitioners to advise the Board if there are any restrictions or limitations placed on their PII policy.
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| 1. It is proposed that the proposed PII arrangements registration standard is reviewed every five years or earlier if required, as the content is likely to be reasonably settled and stable after this review. Is this reasonable?
 | * Members suggest that, given this is a new profession coming on board and could have teething problems, three years would be more appropriate initially.
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| 1. Is there anything else the National Board should take into account in its PII arrangements registration standard, such as impacts on workforce or access to health services?
 | * Given the demands on paramedics and violence in the community members suggest that it would be useful for the National Board to consider the effects on the workforce due to such incidents, their prevalence and access to health services.
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| 1. Do you have any other comments on the proposed PII arrangements registration standard?
 | * It is of concern that practitioners are not required to provide a copy of a Certificate of Currency for PI Insurance when renewing registration.
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