



Submission to the Australian Health Practitioner Regulation Agency: November 2013

International Criminal History Checking

The Australasian College for Emergency Medicine (ACEM) welcomes the opportunity to review and comment on the Australian Health Practitioner Regulation Agency's (AHPRA) *Public consultation paper – International criminal history checking*.

ACEM is a not-for-profit organisation responsible for the training of emergency physicians, and for the advancement of professional standards in emergency medicine (EM), in Australia and New Zealand. ACEM recognises the significant contribution Overseas Trained Specialists (OTS) and International Medical Graduates (IMGs) make to the delivery of emergency care in Australia. As the peak professional organisation for EM in Australasia, ACEM also has a vital interest in the provision of appropriate processes and standards in relation to the assessment of OTSs and IMGs seeking registration as a medical practitioner in Australia.

As noted in our August 2012 submission¹, ACEM is strongly supportive of the role of criminal history checks as an important component of the credentialing process for IMGs and OTSs applying to work as emergency physicians in Australia. ACEM also commends AHPRA for its attempts to continue to improve the registration process for OTSs and IMGs. Following review of the current consultation paper, ACEM provides the following comments:

Is the proposed new approach the best option?

ACEM supports the implementation of 'Option 5', as described in the consultation paper. ACEM considers that this approach is reasonable, and represents a good balance in (i) not unnecessarily delaying registration and (ii) ensuring a robust system which provides adequate protection for the community. In addition, engaging an independent external provider, with appropriate expertise and experience in criminal history checking, could enhance the credentialing process for IMGs and OTSs applying to work in Australia.

Is the proposed approach clear?

ACEM considers the proposed approach is clear.

Are there any risks or issues about the proposed process that need more consideration?

ACEM recommends that in engaging an independent external provider, there is consideration of processes and procedures involved in order to minimise the period between granting registration and completion of the criminal history check.

ACEM considers that the additional cost for the applicant of undertaking the criminal history check(s) may dissuade a small number of OTSs and IMGs, particularly from undertaking short-term training placements in Australia. These doctors may subsequently elect to either remain in their home

¹ http://www.acem.org.au/media/ACEM_submission_International_criminal_history.pdf

country or seek registration in other countries (i.e. New Zealand). AHPRA may wish to consider this consequence and potential impacts on health workforce recruitment, associated with implementing *Option 5*.

Should international criminal history checks be conducted for countries where applicants have spent three months or more, or six months or more?

ACEM recommends that international criminal history checks be undertaken for countries where applicants have been employed for any period of time.

Thank you for the opportunity to provide AHPRA with feedback on *Public consultation paper – International criminal history checking*. If you require any clarification or further information, please do not hesitate to contact the ACEM Director of Policy and Research, Dr Andrew Gosbell [REDACTED]

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Yours sincerely,



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