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Associate Professor Stephen Gough ASM
Chair
Paramedicine Board of Australia
c/o Australian Health Practitioner Regulatory Agency

Dear Associate Professor Gough,

I write to you on behalf of Ambulance Employees Australia Victoria's 4000 members engaged in the ambulance and patient transport sector regarding national registration for paramedics.

Please see below feedback on the registration standards for paramedicine.

Registration Standard: English Language Skills

1. The definition of six years (full time equivalent) continuous education is problematic because it does not allow for candidates to have a break in their study due to life events such as illness or becoming a parent. The word 'continuous' needs to be deleted for the definition to be more flexible and provide for the equivalent of six years' education (full time equivalent).
2. For the English language test results the date of effect should be the date of the test result and not the date of the test as it is for the English language test for nurses and midwives. This subtle difference could result in disadvantage for candidates should there be a delay in the publication of test results.

Registration Standard: Criminal History

1. Where a candidate has committed or allegedly committed a crime that has subsequently been decriminalised the Board should place no significance on the charge.
2. As the states and territories have differing legislation regarding criminal offences there is the potential for there to be inconsistent decisions by AHPRA which may impact the implementation of a national criminal registration standard. We do not believe that traffic infringements such as parking or speeding fines should be required to be disclosed to the Board as could be the case in Tasmania.

Registration Standard: Professional Indemnity Insurance

1. We support the requirement for paramedics to hold professional indemnity insurance (PII).
2. For individuals who are registered by AHPRA across multiple professions such as paramedicine and nursing it should be permissible to hold one PII policy to cover both areas of practice.

3. We seek further instruction as to the scope of coverage to be required. The standard of “adequate and appropriate insurance or professional indemnity insurance” is vague and ambiguous and raises the potential for paramedicine practitioners to be under –insured.

4. We seek further instruction as to the scope of run-off cover required for paramedic practitioners upon leaving the profession. For what period, post the completion of paramedic practice, would run off cover be required?

Registration Standard: Continuing Professional Development

1. The requirement to maintain a current first aid certificate is unnecessary for professional paramedicine practitioners.

2. The Board should accredit CPD providers to ensure that unscrupulous providers do not enter the paramedicine CPD market.

3. Paramedics who have an extended absence from the workplace due to illness or injury should be granted an automatic exemption from the CPD requirements.

Registration Standard: Grandparenting

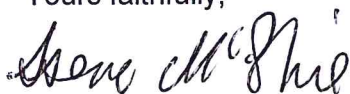
1. For paramedics who work for an emergency ambulance service and who have completed the Diploma of Paramedical Sciences or equivalent should be automatically eligible for grandparenting irrespective of jurisdiction of practice.

2. There should be discretion in the minimum requirement of five years’ service in the past 10 years for paramedics who have had time away from the profession due to life events such as illness, injury or caring responsibilities.

3. Paramedics who are grandparented should be able to hold registration indefinitely without being required to obtain a paramedicine degree provided there is continuity in their practice.

Further we seek clarification as to how New South Wales paramedic students will be nationally registered when they are working towards a diploma and not a degree qualification.

Yours faithfully,



Steve McGhie
Secretary