

## Public consultation on a draft Data strategy

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### Submission template

The Australian Health Practitioner Regulation Agency (Ahpra) is inviting feedback on our draft Data strategy. The Data strategy will guide how we use data that we collect and store.

We are inviting responses to specific questions about our future use of this data and general comments on the draft Data strategy.

In addition to the Data strategy on page 4 of the consultation paper, we are consulting on the future directions for three focus areas:

- the public register of health practitioners
- data sharing, and
- advanced analytics.

### Publication of submissions

We publish submissions at our discretion. We generally publish submissions on our [website](#) to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or if you want us to treat all or part of it as confidential.

**Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.**

Do you want your responses to be published?

- Yes I want my responses to be published
- No I do not want my responses to be published

### Your contact details

Name: Bronwyn Morris-Donovan

Organisation: Allied Health Professions Australia

Contact email: [ceo@ahpa.com.au](mailto:ceo@ahpa.com.au)

### How to give feedback

Please email your submission in a Word document (or equivalent) to [AhpraConsultation@ahpra.gov.au](mailto:AhpraConsultation@ahpra.gov.au) by 31 January 2023.

## Submission template

Please read the public [consultation paper](#) (including the draft Data strategy) before responding. The draft Data strategy can be found on page 7 of the consultation paper.

Draft Data strategy
1. Does the draft Data strategy cover the right issues?
AHPA encourages Ahpra's interest in utilising registration data to support workforce planning needs, especially for the Allied Health workforce. The lack of comprehensive data for this workforce hinders workforce planning, sustainability and service modelling.
2. Do you think that anything should be added to or removed from the draft Data strategy?
The Data strategy would be improved by more detail regarding the processes to improve access to Ahpra data. For example, what bodies does Ahpra consider appropriate to work with? How will Ahpra define "value-add public benefits" to the use of their data? To what extent can/will Ahpra collaborate with organisations, like AHPA, to develop workforce information?
Focus area 1: The public register
3. Do you agree with adding more information to the public register?
<ul style="list-style-type: none"><li>If yes, what additional information do you think should be included?</li><li>If no, please share your reasons</li></ul>
We defer to submissions made by our Allied Health member bodies on this matter.
4. Do you agree with adding health practitioners' disciplinary history to the public register?
<ul style="list-style-type: none"><li>If yes, how much detail should be included?</li><li>If no, please share your reasons</li></ul>
We defer to submissions made by our Allied Health member bodies on this matter.
5. How long should a health practitioner's disciplinary history be published on the public register?
<input type="checkbox"/> 0 to 1 year <input type="checkbox"/> 1 to 4 years <input type="checkbox"/> 5 to 10 years <input type="checkbox"/> 10 to 20 years <input type="checkbox"/> As long as the practitioner is a registered health practitioner <input type="checkbox"/> Disciplinary history should not be published on the public register. Only current conditions or limits on practise should be published on the public register. <input checked="" type="checkbox"/> Other, please describe: We defer to submissions made by our Allied Health member bodies on this matter.
6. Who should be able to add additional information to the public register?

We defer to submissions made by our Allied Health member bodies on this matter.
7. Are there other ways to enhance the effectiveness and value of the public register for the public and/or practitioners?
We defer to submissions made by our Allied Health member bodies on this matter.
<b>Focus area 2: Data sharing</b>
8. The <a href="#">Health Practitioner Regulation National Law</a> enables us to share data with some other organisations in certain situations. Do you have suggestions about how Ahpra could share data with and/or receive data from other organisations to benefit the public, practitioners and/or our regulatory work?
<p>We encourage Ahpra to engage with organisations such as the Office of the Chief Allied Health Officer, AHPA and the Australian Digital Health Agency to enhance the utility of Allied Health data gathered by other organisations.</p> <p>For example, to assist in ensuring the types of data listed under dot point 29 on page 9 of the consultation paper are easily updated by practitioners and therefore accurate for informing the public and general data collection; Ahpra should consider engaging with the Australian Digital Health Agency in relation to their Provider Connect Australia initiative.</p> <p>In addition, the Allied Health Workforce Data Gap Analysis conducted for the Department of Health (Sept. 2022) identified several recommendations to utilise existing datasets from Ahpra with other allied health organisations to create a better understanding of the allied health workforce. Ahpra should engage with the Office of the Chief Allied Health Officer in the Department of Health to develop collaborative initiatives for better allied health workforce data gathering.</p>
<b>Focus area 3: Advanced analytics</b>
9. Do you have any suggestions about how Ahpra should approach using advanced analytics and machine learning technologies?
Click or tap here to enter text.
<b>Other</b>
10. Please describe anything else Ahpra should consider in developing the Data strategy.
Click or tap here to enter text.

**Thank you**

Thank you for participating in this consultation. Your feedback will support Ahpra and the National Boards to use data to improve public safety.

Please email your submission to [AhpraConsultation@ahpra.gov.au](mailto:AhpraConsultation@ahpra.gov.au) by 31 January 2023.

Ahpra acknowledges the Traditional Owners of Country throughout Australia and their continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures and Elders past, present and emerging.