



## Public consultation paper

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19 May 2014

### **You are invited to provide feedback on this public consultation**

Consultation on Guidelines for infection control

#### **You are invited to provide feedback**

Please provide feedback in a word document (or equivalent) <sup>1</sup>by email to [podiatryconsultation@ahpra.gov.au](mailto:podiatryconsultation@ahpra.gov.au) by close of business on 14 July 2014.

#### **Public consultation**

The Podiatry Board of Australia (Board) is releasing the attached consultation paper on the review of the *Guidelines for infection control*. You are invited to provide your comments on the consultation paper, including the questions in the paper, by 14 July 2014.

#### **How your submission will be treated**

Submissions will generally be published unless you request otherwise. The National Boards publish submissions on their websites to encourage discussion and inform the community and stakeholders. However, the Boards retain the right not to publish submissions at their discretion, and will not place on their website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the consultation.

Before publication, the Board will remove personally-identifying information from submissions, including contact details. The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the Boards.

The Board also accepts 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 These submissions will not be published on the website or elsewhere.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. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cwlth), which has provisions designed to protect personal information and information given in confidence.

Please let the Board know if you do not want your submission published, or want all or part of it treated as confidential.

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<sup>1</sup> You are welcome to supply a PDF file of your feedback in addition to the word (or equivalent) file, however we request that you do supply a text or word file. As part of an effort to meet international website accessibility guidelines, AHPRA and National Boards are striving to publish documents in accessible formats (such as word), in addition to PDFs. More information about this is available at [www.ahpra.gov.au/About-AHPRA/Accessibility.aspx](http://www.ahpra.gov.au/About-AHPRA/Accessibility.aspx).

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## Overview

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19 May 2014

### Review of Guidelines for infection control

#### Background

1. Under section 39 of the Health Practitioner Regulation National Law as in force in each state and territory (the National Law) the Board may develop and approve codes and guidelines to provide guidance to the health practitioners it registers.
2. The Board has developed and approved *Guidelines for infection control* which took effect on 1 July 2010. These guidelines are to be reviewed regularly, in keeping with good regulatory practice.
3. These guidelines have been in place for over three years and the Board has not had any major issues in relation to their requirements. The Board has reviewed the guidelines and is seeking feedback on the proposed revised guidelines.

#### Estimated impacts of the proposed revised guidelines

4. The changes proposed in the revised guidelines are relatively minor, although more significant changes may be proposed through consultation. The review has given the Board the opportunity to improve the guidelines by revising the language and structure to make them clearer and easier to understand.
5. There is little impact anticipated on practitioners and other stakeholders arising from the changes proposed.

#### Questions for consideration

6. The Board is inviting feedback on the following questions:
  1. Do you think the proposed revised *Guidelines for infection control* are clear and easy to understand?
  2. Do you have any other comments on the proposed revised guidelines?

#### Attachments

7. The proposed revised *Guidelines for infection control* follow at page four of this consultation paper.
8. The current *Guidelines for infection control* are published on the Board's website, accessible from [www.podiatryboard.gov.au/Policies-Codes-Guidelines.aspx](http://www.podiatryboard.gov.au/Policies-Codes-Guidelines.aspx).
9. The *Statement of assessment against AHPRA's Procedures for development of registration standards and COAG principles for best practice regulation* is at Attachment 1.



## Guidelines

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### Guidelines for infection control (DRAFT)

**Effective from:** <<date>>

**Review date:** <<date>>

#### Introduction

These guidelines have been developed by the Podiatry Board of Australia (Board) to guide podiatrists and podiatric surgeons about appropriate professional practice with respect to infection prevention and control in podiatry practice.

Effective infection prevention and control is central to providing high quality health care for patients and a safe working environment for those that work in healthcare settings.<sup>2</sup>

It is critical for podiatrists and podiatric surgeons to ensure that effective infection prevention and control is an integral part of all aspects of their professional practice.

#### Who needs to use these guidelines?

They apply to all registered podiatrists and podiatric surgeons except those with non-practising registration.

Podiatrists and podiatric surgeons should ensure that all individuals that they work with in their practice also adhere to these guidelines.

#### Requirements

The Board adopts the National Health and Medical Research Council *Australian guidelines for the prevention and control of infection in healthcare* (NHMRC guidelines). The NHMRC guidelines were developed using the best available evidence at the time they were written and they aim to promote and facilitate the overall goal of infection prevention and control.

A link to the NHMRC guidelines is provided under the *Policies, codes and guidelines* section of [www.podiatryboard.gov.au](http://www.podiatryboard.gov.au).

All practising podiatrists and podiatric surgeons must be familiar with and practise within the recommendations of the NHMRC guidelines as they apply to the practice setting(s) in which they work.

#### Authority

The Podiatry Board of Australia (the Board) has developed these guidelines under section 39 of the Health Practitioner Regulation National Law, as in as in force in each state and territory (the National Law).

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<sup>2</sup> NHMRC (2010) *Australian guidelines for the prevention and control of infection in healthcare*, Commonwealth of Australia

Guidelines approved by the Board may be used as evidence of what constitutes appropriate professional conduct or practice for podiatry in proceedings against a health practitioner under the National Law, or a law of a co-regulatory jurisdiction.

## Review

These guidelines will be from time to time as required. This will generally be at least every three years.

Last reviewed: <date>

These guidelines replace the previous guidelines published from 1 July 2010.

Consultation draft

Board's statement of assessment against AHPRA's *Procedures for development of registration standards* and *COAG principles for best practice regulation*

- Guidelines for infection control

The Australian Health Practitioner Regulation Agency (AHPRA) has *Procedures for the Development of Registration Standards* which are available at: [www.ahpra.gov.au](http://www.ahpra.gov.au)

These procedures have been developed by AHPRA in accordance with section 25 of the *Health Practitioner Regulation National Law* as in force in each state and territory (the National Law) which requires AHPRA to establish procedures for the purpose of ensuring that the National Registration and Accreditation Scheme operates in accordance with good regulatory practice.

Below is the Board's assessment of its proposal for the revised draft guidelines included in this consultation paper against the three elements outlined in the AHPRA procedures.

**1. The proposal takes into account the National Scheme's objectives and guiding principles set out in section 3 of the National Law**

**Board assessment**

The Board considers that the revised draft guidelines meet the objectives and guiding principles of the National Law.

The revised draft *Guidelines for infection control* provide for the protection of the public by providing clear guidance on infection control and prevention to ensure that practitioners practice effective infection control and prevention in all aspects of their podiatry practice.

The revised draft guidelines also support the National Scheme to operate in a transparent, accountable, efficient, effective and fair way.

**2. The consultation requirements of the National Law are met**

**Board assessment**

The National Law requires wide-ranging consultation on proposed guidelines. The National Law also requires the Board to consult other boards on matters of shared interest.

The Board will ensure that there is public exposure of its proposals and there is the opportunity for public comment by undertaking an eight week public consultation process. This process includes the publication of the consultation paper on its website.

The Board has drawn this paper to the attention of key stakeholders.

The Board will take into account the feedback it receives when finalising its proposals.

**3. The proposal takes into account the COAG Principles for Best Practice Regulation**

**Board assessment**

In developing the revised draft guidelines for consultation, the Board has taken into account the Council of Australian Governments (COAG) *Principles for Best Practice Regulation*.

As an overall statement, the Board has taken care not to propose unnecessary regulatory burdens that would create unjustified costs for the profession or the community.

The Board makes the following assessment specific to each of the COAG principles expressed in the AHPRA procedures.

## COAG Principles

### A. Whether the proposal is the best option for achieving the proposal's stated purpose and protection of the public

#### Board assessment

The Board considers that its proposals are the best options for achieving the stated purposes. As only minor changes to the existing guidelines are proposed, the impact of the proposals is similar to the existing guidelines.

The Board considers that the revised draft guidelines would have a low impact on the profession. These low impacts are significantly outweighed by the benefits of protecting the public and providing clearer requirements, in the public interest.

### B. Whether the proposal results in an unnecessary restriction of competition among health practitioners

#### Board assessment

The Board considered whether its proposals could result in an unnecessary restriction of competition among health practitioners. The proposals are not expected to impact on the current levels of competition among health practitioners.

### C. Whether the proposal results in an unnecessary restriction of consumer choice

#### Board assessment

The Board considers that the revised draft *Guidelines for infection control* will support consumer choice, by establishing clear requirements effective infection prevention and control in podiatry practice.

### D. Whether the overall costs of the proposal to members of the public and/or registrants and/or governments are reasonable in relation to the benefits to be achieved

#### Board assessment

The Board considered the overall costs of the revised guidelines to members of the public, registrants and governments and concluded that the likely costs are appropriate when offset against the benefits that the revised draft guidelines contribute to the National Scheme.

Subject to stakeholder feedback on the proposed revisions, the revised draft guidelines in their current draft form should have only minimal impact on the costs to applicants by presenting the Board's requirements in a clearer way.

### E. Whether the requirements are clearly stated using 'plain language' to reduce uncertainty, enable the public to understand the requirements, and enable understanding and compliance by registrants

#### Board assessment

The Board considers that the revised draft guidelines have been written in plain English that will help practitioners to understand their requirements. The Board has changed the structure of the guidelines and reviewed the wording to make them clearer and easier to understand.

### F. Whether the Board has procedures in place to ensure that the proposed registration standard, code or guideline remains relevant and effective over time

#### Board assessment

The Boards will review the revised guidelines at least every three years, including an assessment against the objectives and guiding principles in the National Law and the COAG principles for best practice regulation.

However, the Board may choose to review the guidelines earlier, if it is necessary to ensure their continued relevance and workability.