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Dear Dr Katsoris

AHPRA Consultation – Core Registration Standards

Avant welcomes the opportunity to provide input into AHPRA's core registration standards.

Professional Indemnity Insurance

Avant supports the adoption of option 2 whereby the Board submits a proposed revised registration standard to the Ministerial Council for approval.

Avant believes that the proposed revised registration standard is helpful both to insurers and to medical practitioners.

We agree with the addition of the section entitled "Other indemnified employer".

For further clarity, because many practitioners are contractors rather than employees, we suggest insertion in section 1 of a reference to contracted practitioners in the paragraph numbered 1 so it reads:

... those employed by or contracted to others ...

In our experience, our members are frequently confused about what evidence the Board requires to demonstrate that they have appropriate professional indemnity insurance. To clarify this, we suggest including reference to a certificate of currency in the first sentence under the heading "Evidence", so that it reads:

"The Board may, at any time, require you to provide evidence that you have appropriate PII arrangements in place, such as a certificate of currency."

Continuing Professional Development

Avant supports the adoption of option 2 whereby the Board submits a proposed revised registration standard to the Ministerial Council for approval.

Avant believes that the proposed revised registration standard is helpful and provides greater clarity about practitioners' CPD obligations.



It appears to us that paragraphs 2 and 3 under “More information” do not merely provide additional information, but are directive and outline key requirements that need to be met under the standard. We suggest that these paragraphs be moved into the body of the standard, at the beginning, under “What must I do”, before the numbered paragraphs.

Recency of Practice

Avant supports the adoption of option 2 whereby the Board submits a proposed revised registration standard to the Ministerial Council for approval.

Avant believes that the proposed revised registration standard is helpful and provides greater clarity about the minimum requirements for recency of practice.

We suggest two additions in the section entitled “Requirements for medical practitioners with non- practising registration....” to further clarify practitioners’ obligations.

1. In subparagraph a (i) an addition to the end of the sentence so it reads “*there are no specific requirements that have to be met before re-commencing practice (apart from fulfilling registration requirements)*”
2. In subparagraph b (i) an addition at the beginning of the sentence so it reads “*at a minimum, before re-commencing practice, you must complete*” Wording similar to this is included in the current registration standard but not in the draft proposed standard.

We also suggest that paragraph 3 under “More Information” be moved to the beginning of the standard, under “What I must do”.

Please contact me on the details below if you require any further information or clarification of the matters raised in this letter.

Yours sincerely



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About Avant

Avant Mutual Group Limited (“Avant”) is Australia’s largest medical defence organisation, and offers a range of insurance products and expert legal advice and assistance to over 60,000 medical and allied health practitioners and students in Australia. Our insurance products include medical indemnity insurance for individuals and practices, as well as private health insurance, which is offered through our subsidiary The Doctors’ Health Fund Pty Limited.

Our members have access to medico-legal assistance via our Medico Legal Advisory Service. We have offices throughout Australia, and provide extensive risk advisory and education services to our members with the aim of reducing medico-legal risk.