

Hey **REDACTED**,

### Allied health

As discussed yesterday I've included below the professionals that I thought wouldn't fit within the definition of 'health professional' or 'allied health professional'. I note that Allied Health Professionals Australia (AHPA) has included much of these titles within their definition of 'allied health', but obviously they aren't an authority on the definition. HealthDirect also lists many of these professionals as 'allied health professionals', but if the list is relying on the definition of the national law then many obviously wouldn't be included.

But as you said I know you've probably got a million pieces of feedback on this so I'll keep it brief to just the professionals that stuck out to us (and that wouldn't be aged care workers).

Item	Related professional	Notes
S 32 – Item 5	Dietitian/Nutritionist	Noting that these professionals are not health 'practitioners' under the national law. They are prescribed as 'health services' though.  S 42 – Item 1 also explicitly states 'dietitian' but isn't linked to any definition.  Governing bodies: Australasian Association and Register of Practicing Nutritionists / Dietitians Australia
S 32 – Item 13	Music therapist	Nil prescription in the National law.  Governing body: Australian Music Therapy Association
S 36 – Item 5	Art therapist	Nil prescription in the National law.  Governing body: Australian, New Zealand and Asian Creative Arts Therapies Association.
S 59 – Item 3	Audiologist	Audiology is also prescribed as a 'health service' under the national law but the profession does not appear to be included in 'health practitioners'.

### Use of the phrase 'Imminent'

As I mentioned yesterday I've previously looked in to this type of wording when reviewing the current SIRS model and we reviewed various state and territory Severity Assessment Codes (SACs). Taking a look at s 38 item 2 I can see where some of the feedback would be coming from as it is difficult to define 'imminent safety risk' as its currently drafted. I would recommend considering wording that specifies services that are required to address a age-related safety risk that is *reasonably foreseeable* and *likely* to cause immediate harm if not addressed. This combination may provide more clarity rather than just 'imminent'.

Kind Regards.

**REDACTED**