

Private Practice Guidelines to conduct clinical practice within the Griffith Health Clinics

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Description	<p>These Guidelines outline the decision-making principles underpinning approval and conduct of private practice undertaken by Griffith staff who are approved to conduct private practice (in accordance with the Griffith University Private Practice Policy), and non-Griffith staff who are approved to conduct private practice within Griffith Health Clinics. These Guidelines fall within the scope of the Private Practice Policy with respect to Griffith staff. In the event of any inconsistency between these Guidelines and the Private Practice Policy, it will be the Private Practice Policy that will prevail to the extent of the inconsistency.</p> <p>The term "professional practice" used throughout the document refers to discipline-based healthcare practice.</p>

Related documents

[Application for Clinical Privileges in Griffith Health Clinics](#)

[Code of Conduct](#)

[Conflict of Interest Policy](#)

[Consultancy and Commercial Research Policy](#)

[Griffith Health Clinics Fee Charging Policy](#)

[Griffith Health Clinics Guidelines for Professional Practice](#)

[Griffith University Code for the Responsible Conduct of Research](#)

[Personal Relationships in the Workplace](#)

[Private Practice Policy](#)

External Links:

[Dental Technicians Registration Act 2001](#)

[\[Introduction\]](#) [\[Guiding Principles\]](#) [\[Principles Underpinning Provision of Treatment to Patients/Clients from Health Group-run clinic facilities\]](#) [\[Administration and Disbursement of Income\]](#) [\[Insurance\]](#) [\[Process for Approval of Private Practice\]](#) [\[Performance Management of Private Practice\]](#) [\[Dissatisfied Patients/Clients\]](#) [\[Leave and Cessation of Intramural Professional Practice\]](#) [\[Practitioner Responsibilities to Meet and Maintain Pre-Practice Requirements\]](#) [\[Schedule 1 - School of Dentistry and Oral Health \(DOH\) Clinics\]](#) [\[Schedule 2 – Allied Health Clinics\]](#) [\[Schedule 3 – Psychology Clinic\]](#) [\[Appendix 1\]](#)

1. INTRODUCTION

1.1 These guidelines apply to:

1.1.1 Griffith staff who are approved (in accordance with the Private Practice Policy and the terms of these Guidelines) to engage in the delivery of clinical healthcare services from within Health Group-run clinics outside of their University workload profile; and

- 1.1.2 non-Griffith staff who are approved to conduct private practice from Griffith Health Clinics.

All staff undertaking activities under these Guidelines, the Private Practice Policy and the Consultancy and Commercial Research Policy are expected to act in accordance with all relevant policies and guidelines of the University (including the Code of Conduct, Griffith University Code for the Responsible Conduct of Research, Personal Relationships in the Workplace Policy, Griffith Health Clinics Guidelines for Professional Practice, and Conflict of Interest Policy).

- 1.2 Specific arrangements for the respective Griffith Health Clinics are attached as Schedules to these Guidelines. In the event of any inconsistency between the Guidelines and the Schedules, the Guidelines will apply unless some other school specific arrangements have been approved by the PVC (Health) and the Deputy Vice Chancellor (Academic).

2. GUIDING PRINCIPLES

In addition to the Guiding Principles outlined in the Private Practice Policy, the conduct of private practice within Griffith Health Clinics is also governed by the following principles:

- 2.1 The Health Group recognises the synergies of professional practice, teaching and research, and benefits that can be achieved through supporting the development of a strong community of clinical and professional academics.
- 2.2 The Health Group considers it desirable that the clinical expertise and skills that staff members and external clinicians possess be available through the Griffith Health Clinics to benefit the community at large.
- 2.3 The Health Group endorses and encourages Griffith staff with clinical expertise and registration to maintain and improve their expertise by becoming involved in either intramural professional practice (where the professional practice is counted **within** the staff members' allocated workload), or private practice (where the professional practice is undertaken and is **outside of** the staff members' allocated workload) within University-run clinics.
- 2.4 Applications by staff to undertake extramural private practice (where professional practice is undertaken in clinics external to the University) will not normally be approved when the opportunity exists for the staff to undertake intramural professional practice or private practice in facilities and services run by the University.
- 2.5 A proportion of the practice fees which are collected in return for the provision of private practice services, and/or direct charges for the use of Griffith Health Clinic facilities, will be payable to the University (including Group and host School) to cover costs incurred in supporting the private practice. These percentages/charges will be determined by the University and the Group in accordance with the principles outlined in the relevant Schedule to these Guidelines.
- 2.6 Private practice should be self-supporting, that is, it should be structured and delivered in a way that ensures practice fees payable to the University (including Group and host School) will cover all costs incurred by the University in supporting the private practice. Should the University determine that a practitioner's private practice is not self-supporting, approval to conduct private practice may be reviewed in accordance with clause 6.5 of these guidelines and the Private Practice Policy.
- 2.7 Basic services will be provided by the University to support private practice. Basic services, and services outside of the scope of what will be provided by the University, are listed in Appendix 1.
- 2.8 Private practice will be conducted so as to:
 - 2.8.1 be consistent with the philosophy and aims of the University and the Griffith Health Clinics;
 - 2.8.2 deliver a demonstrable benefit to the University;
 - 2.8.3 develop and enhance, and not to harm in any way, the reputation and standing of the University;

- 2.8.4 where practicable, contribute to the advancement of learning, research, scholarship and the clinical reputation of the University.
 - 2.9 Approval by the Pro Vice Chancellor (Health) for a practitioner to undertake private practice will only be provided :
 - 2.9.1 for the scope of work for which the practitioner is professionally registered to practise with the relevant Registration Board; and
 - 2.9.2 for the scope of work for which the practitioner is approved to practise by the Griffith Health Clinical Privileging Committee, and
 - 2.9.3 where approval is granted in accordance with the Private Practice policy.
 - 2.10 Private practice should not compete with the business of the University.
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3. PRINCIPLES UNDERPINNING PROVISION OF TREATMENT TO PATIENTS/CLIENTS FROM HEALTH GROUP-RUN CLINIC FACILITIES

- 3.1 All patients/clients of Health Group-run clinics will receive high quality and appropriate treatment which is delivered in accordance with accepted professional, ethical and service quality standards.
 - 3.2 All patients/clients of Health Group-run clinics (or their legal guardian) will receive clear information about their treatment, options, risks, benefits, costs and likely outcomes so that they can make informed decisions about their care.
 - 3.3 All patients/clients of Health Group-run clinics (or their legal guardian) will have the opportunity to decline or consent to treatment free from coercion.
 - 3.4 Informed consent will be required from all patients/clients (or their legal guardian) for whom treatment will incur financial charges, prior to the treatment being commenced.
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4. ADMINISTRATION AND DISBURSEMENT OF INCOME

- 4.1 Fees to be charged to patients/clients for treatment provided through private practice will be determined by the practitioner who is undertaking the practice.

Once treatment fee schedules have been determined, the practitioner undertaking the private practice will ensure that processes are in place to accurately record treatment undertaken so that accurate fees can be calculated and subsequently charged to the patient/client.
- 4.2 Invoices will be generated from the Patient Management System (PMS) used within the clinic and there will be a reconciliation between the PMS Debtors and a Debtors Control account in the PeopleSoft General Ledger. Invoices will be issued under Griffith University's name, however the individual practitioner's private provider number must be displayed on the invoice as the staff member is acting in the capacity as a private practitioner.
- 4.3 The costs associated with a practitioner's delivery of private practice including pro bono practice (e.g., clinic infrastructure, utilities, support staff and consumables where applicable) may be initially met by the University (including Corporate, Group and host School levels) in the first instance, and then recovered by the University from the practitioner, or alternatively may be recovered directly from the fees collected by the University from patients/clients before the disbursement of income to the practitioner occurs (in accordance with the relevant Schedule to these guidelines).
- 4.4 The University reserves the right to levy either an appropriate percentage of income generated by a practitioner's private practice and/or a flat fee per hour through which costs incurred by the University in supporting the private practice may be recovered. Fees/charges recovered by the University will be determined by the University as indicated in the relevant schedule to these guidelines, taking into consideration also the specific costs/overheads incurred by the University in supporting clinics within each discipline, and the standards that apply to managing income for the discipline within similar clinical services external to the University. In

the event that insufficient income or no income (e.g., as a result of pro bono work or bad debts) is generated by a practitioner's private practice, the University may impose a charge on the practitioner to meet the costs incurred by the University.

- 4.4.1 The PVC (Health) will determine, in accordance with the relevant schedule to these Guidelines, the charges retained by the Group and host School to meet the costs associated with the professional practice incurred by the Group and host School. The PVC (Health) may from time to time amend the terms and conditions, including the payment of charges/percentages of treatment income payable to the Group and host School, on which the Griffith Health clinic facilities may be made available to practitioners undertaking private practice.
- 4.4.2 The Vice President (Corporate Services) will determine the charges that are to be retained by the University to meet the costs associated with the professional practice incurred by the University. The Vice President (Corporate Services) may from time to time amend the terms and conditions, including the payment of charges/percentages of treatment income payable to the University, on which the Griffith Health clinic facilities may be made available to practitioners undertaking private practice.
- 4.4.3 It is a condition of the right of private practice undertaken within Griffith Health Clinics that practitioners comply with any terms and conditions set by the PVC (Health) and/or Vice President (Corporate Services) with respect to charges levied to recover costs incurred by the University.
- 4.5 Practitioners undertaking private practice will abide by the decisions of the University and the Group with respect to percentages of practice fees/charges payable to the University, Group and host School.
- 4.6 Income collected by the University (Group or School) from private practice, after University, Group and host School deductions have been made will be payable to the practitioner. Griffith staff who conduct private practice will have the ability to decide whether to have this income paid into their research account, or taken in full or part as salary (note income collected by the University and paid to Griffith staff may only be taken as salary at the time that it is disbursed by the University to the staff member following the quarterly reconciliation of clinic finances).
- 4.7 Income collected directly by the practitioner from patients/clients is the responsibility of the practitioner.
- 4.8 It is the responsibility of the practitioner to ensure that any income taken as salary or collected directly from patients/clients is appropriately reported to the Australian Taxation Office for taxation purposes.

5. INSURANCE

- 5.1 Practitioners, including Griffith staff who are undertaking private practice (i.e., professional practice that is outside of their assigned Griffith workload), must hold and maintain their own insurances (including public liability, professional indemnity and medical malpractice insurance where applicable) to cover their professional work¹, as their professional practice will not be covered under the University's policies, and they will not be defended by the University in the event of a claim. Practitioners seeking to undertake private practice in Griffith Health Clinics will be required to present evidence to the University that sufficient insurance coverage is held prior to commencing practice.
- 5.2 It is the responsibility of the practitioner to ensure that their insurance cover is up to date and a copy of this is provided to the University.

¹ In the case where a practitioner is employed by a professional practice agency external to the University (e.g., public or private sector healthcare organisation), the required insurance covering the staff member's professional practice may be held on behalf of the staff member by the professional practice agency though must not contain any specific exclusions relating to their practice within the Griffith Health Clinics.

6. PROCESS FOR APPROVAL OF PRIVATE PRACTICE

- 6.1 A practitioner seeking approval to undertake private practice must submit and be approved to conduct the practice in accordance with the Private Practice policy.
- 6.2 A practitioner seeking approval to undertake private practice within Griffith Health Clinics must also submit for endorsement a completed Application for Clinical Privileges in Griffith Health Clinics clearly indicating that approval is sought to undertake private practice to:
 - 6.2.1 the Director/Lead of the respective Griffith Health Clinic in which they are seeking to practice; followed by
 - 6.2.2 their Head of School (in the event that the practitioner is a Griffith staff member); followed by
 - 6.2.3 the Griffith Health Clinical Privileging Committee.

At each stage of the endorsement process (above), consideration will be given to a range of matters as deemed necessary by each endorsing body, including but not limited to the suitability and viability of the proposed clinical service, the suitability of the practitioner to engage in clinical practice within Griffith Health Clinics, and consistency of the application with the philosophy and aims of the University and the Griffith Health Clinics, and the University's policies (including but not limited to the Code of Conduct, Personal Relationships in the Workplace policy and Conflicts of Interest policy). An application is required to be submitted regardless of whether the professional practice is to be offered for payment or on a pro bono basis;

- 6.3 Should the Clinical Privileging Committee endorse the application to conduct private practice a copy of the full application and committee recommendations will be forwarded to the PVC (Health) with its recommendation for a decision regarding privileges to be awarded to the practitioner to conduct private practice within Griffith Health Clinics;
- 6.4 The practitioner will be notified in writing by the PVC (Health) of the outcome of the application, including where applicable, any limitations or conditions on the privileges granted. Approval for practitioners to undertake private practice in Griffith Health Clinics may be given for up to three years at a time though continued privileges to conduct clinical practice within the Griffith Health Clinics are reviewed on an annual basis in accordance with clause 7. At the satisfactory conclusion of an approved term of private practice, the practitioner may reapply for approval to undertake a further term of private practice through the process outlined in this clause 6;
- 6.5 Heads of School will maintain a register of all approved requests for professional practice relating to staff within their School;
- 6.6 Subject to contractual conditions, the PVC (Health) may at any time grant, refuse, reduce, suspend or withdraw their support for any practitioner's right of private practice in Griffith Health Clinics.

7. PERFORMANCE MANAGEMENT OF PRIVATE PRACTICE

- 7.1 Approved private practice arrangements will be reviewed by the Clinical Privileging Committee (or a delegated sub-committee) annually or at any other time as deemed appropriate by the Committee.
- 7.2 If, in the event a practitioner's private practice activities are deemed unsatisfactory, or if conditions of clinical privileging awarded by the PVC (Health) are not complied with, the PVC (Health) reserves the right to invoke section 6.6 whereby support for rights of private practice in Griffith Health Clinics may be reduced or withdrawn, and in the case of Griffith staff, a review of continued rights may be instigated under the Private Practice policy.
- 7.3 An annual statement outlining approved professional practice undertaken by Griffith staff in each School over each calendar year will be prepared by the relevant Head of School and submitted to the PVC (Health) by December each year.

8. DISSATISFIED PATIENTS/CLIENTS

- 8.1 Where a patient/client is dissatisfied with the standard of treatment provided by a practitioner undertaking private practice within Griffith Health Clinics, the relevant clinic policies, procedures and guidelines relating to patient or client complaints will be invoked to review and manage the matter. Complaints should be resolved either within the Clinic or the host School where possible. In the event of a serious complaint or where a complaint is escalated it should be referred to the Clinical Complaints Sub-Committee (a sub-committee of the Clinical Privileging Committee).
 - 8.2 The Group reserves the right to invoke section 6.6 whereby the rights of private practice within Griffith Health Clinics may be reduced, suspended or withdrawn during a review of a complaint from a dissatisfied patient/client. The practitioner involved must however continue to participate in the investigation and review of the complaint.
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9. LEAVE AND CESSATION OF PRIVATE PRACTICE

- 9.1 Practitioners engaged in private practice within Griffith Health Clinics must inform their clinic manager of any annual or other planned leave at least four weeks in advance of taking leave.
 - 9.2 The practitioner is responsible for ensuring that appropriate cover has been arranged for the ongoing management of their patients/clients during their absence.
 - 9.3 In the event of unforeseen leave for sickness or emergency the practitioner must inform the clinic manager as soon as is practicable in accordance with the relevant clinic policy, procedure or guideline.
 - 9.4 At cessation of private practice within Griffith Health Clinics the practitioner must ensure, in liaison with the clinic manager that satisfactory arrangements are in place for the continuing care of patients/clients.
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10. PRACTITIONER RESPONSIBILITIES TO MEET AND MAINTAIN PRE-PRACTICE REQUIREMENTS

- 10.1 Any practitioner wishing to practise in a Griffith Health-run clinic must hold and maintain evidence that they have met and continue to meet the pre-practice requirements which have been determined by the Clinical Privileging Committee. These requirements may include, but are not limited to:
 - (i) Provider/prescriber/registration/licensing details;
 - (ii) Professional qualifications;
 - (iii) Professional supervision arrangements;
 - (iv) Insurance.
 - (v) Immunisation status;
 - (vi) First aid qualification;
 - (vii) Criminal record checks (e.g., Blue Card);
 - (viii) Evidence of compliance with continuing professional development requirements of the professional registering body;
 - (ix) Assurance that no conflict of interest applies with respect to the private practice (in accordance with the University's Conflict of Interest policy);
 - 10.2 The practitioner must be able to produce evidence that they hold current clearances with respect to pre-practice requirements, and must notify the Chair of the Clinical Privileging Committee and the clinic Director/Lead if there are any changes in their status with respect to meeting or maintaining pre-practice requirements.
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- 10.3 In the event that there are any changes in the status of a practitioner who has been approved to undertake private practice in Griffith Health Clinics with respect to meeting or maintaining pre-practice requirements which in the Group's discretion would impact the practitioner's ability to continue to undertake private practice, the Group reserves the right to invoke section 6.6 whereby the rights of private practice in Griffith Health Clinics may be reduced, suspended or withdrawn until the required pre-practice requirements have been obtained.
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SCHEDULE 1 - SCHOOL OF DENTISTRY AND ORAL HEALTH (DOH) CLINICS

- 1) Private practice is available to appropriately authorised staff of the School of Dentistry and Oral Health and to external practitioners who are registered as:
 - (i) A Dental Prosthetist under the Dental Technicians Registration Act 2001; or
 - (ii) A General Dental Practitioner, Limited Registration Practitioner or Specialist Dental Practitioner registered with the Dental Board of Australia (AHPRA).

Administration and Disbursement of Income

- 2) Once treatment fee schedules have been determined, the practitioner undertaking the private practice will provide fee details to the relevant clinic administrator to enable billing to be undertaken.
- 3) Practitioners granted rights of private practice in Griffith Health Clinics will receive 40% of the net earnings² from their own patient/client income earned from treatment provided within Health Group-run clinics. The remaining 60% shall be retained by the University (including Corporate, Group and host School levels) to cover costs incurred in supporting the professional practice.
- 4) Technical laboratory fees may be costed directly to a patient/client in addition to the standard fee schedule.
- 5) At the end of each quarter, the relevant clinic administrator will reconcile all private practice receipts for that quarter, and determine the appropriate amount to be paid to the relevant practitioner. The practitioner will be asked to invoice the Clinic for the 40% of collected fees for the quarter.

² Net earnings - means the fee charged for a specific treatment by a staff member undertaking private practice, less any costs deemed by the Deputy Head of School (Clinical Education) as external costs which are incurred by the University (e.g., including but not limited to radiography, laboratory services, or extraordinary materials costs such as implant components and specialist surgical supplies).

SCHEDULE 2 - ALLIED HEALTH CLINICS

- 1) Private practice is available to appropriately authorised staff of the School of Allied Health Sciences and to external practitioners who are registered and/or (in the instance where a profession is not registered with AHPRA) approved by the Griffith Health Clinical Privileging Committee (CPC) as:
 - (i) A Physiotherapist registered with the Physiotherapy Board of Australia, AHPRA
 - (ii) A Dietitian with acceptable qualifications, as approved by the CPC
 - (iii) A Speech Language Therapist with acceptable qualifications, as approved by the CPC
 - (iv) An Occupational Therapist registered through Occupational Therapy Board of Australia, AHPRA
 - (v) An Exercise Physiologist registered with Exercise & Sport Science Australia (ESSA)

Administration and Disbursement of Income

- 2) Once treatment fee schedules have been determined, the practitioner undertaking the private practice will provide fee details to the relevant clinic administrator to enable billing to be undertaken.
- 3) Practitioners granted rights of private practice in Griffith Health Clinics will be charged:
 1. a flat per-hour fee for use of clinic space³; plus
 2. 35% of net earnings⁴ from patient fees.
- 4) At the end of each quarter, the relevant clinic administrator will reconcile all private practice receipts for that quarter, and determine the appropriate amount to be paid to the relevant practitioner.

³ The flat per-hour fees payable for the use of clinic space will be determined in accordance with the clinic space charging model applicable at the time the clinic space is being used (this model is managed on behalf of the Group by the Office of Planning & Financial Services).

⁴ Net earnings - means the fee charged for a specific treatment by a practitioner undertaking private practice, less the cost of clinic space.

SCHEDULE 3 - PSYCHOLOGY CLINIC

- 1) Private practice is available to appropriately authorised staff of the School of Applied Psychology and to external practitioners who are registered as a Psychologist with the Psychology Board of Australia, AHPRA

Administration and Disbursement of Income

- 2) Practitioners granted rights of private practice in Griffith Health Clinics will be charged a flat per-hour fee charge for use of clinic space⁵. Practitioners will be responsible for collecting client fees, and managing the administration of their practice.
- 3) The practitioner will reimburse the University at the end of each month for the rooms booked during the month.
- 4) The Clinic administrator will reconcile all private practice room bookings at the end of each quarter, and ensure the appropriate amount was paid by the relevant practitioner to the University.

⁵ The flat per-hour fees payable for the use of clinic space will be determined in accordance with the clinic space charging model applicable at the time the clinic space is being used (this model is managed on behalf of the Group by the Office of Planning & Financial Services).

APPENDIX 1

Basic services that will be provided by the University to facilitate private practice:

1. Access to approved clinic facilities/rooms;
2. Limited reception services;
3. Standard resources, equipment, facilities and consumables generally available within the Griffith Health Clinics that are required to support the approved practice;
4. Dental Assistants in the case of dental private practice;
5. Other standard services as deemed necessary by the PVC Health.

Limitations to services provided by the Griffith Health Clinics to support private practice clinics.

The list below specifies services that are outside of the scope of services that will be provided by the Griffith Health Clinics to support private practice clinics. The University may, in its sole discretion, agree to supply the services listed below, however if it does so it reserves the right to pass on the costs associated with the provision of the services to the practitioner through fees/charges over and above the standard fees and charges specified in the Schedules to this policy.

This list may be amended from time to time on the approval of the Pro Vice Chancellor (Health).

1. Patient/client recruitment to support private practice clinics. The responsibility for recruiting patients/clients to a private practice rests with the practitioner. The manager of a Health Group-run clinic (or in the absence of such a person, the Head of School with which the clinic is associated or their nominee) may, at their discretion, assist with promotion of staff members' private practice.
2. Provision of personalised or specialised clinic stationery (e.g., referral pads) beyond the scope of the stationery normally supplied by the Clinic for use by clinicians.
3. Medical typing services, including typing of correspondence to patients and clinicians related to private practice clinics. Clinicians wishing to access medical typing services may either:
 - a. source their own services external to the University, or
 - b. make arrangements for the Griffith Health Clinics to procure the services of a medical typist on their behalf, the cost of which will be passed on in full to the clinician.
4. Specialised resources, equipment, facilities and consumables which are not generally available within the Griffith Health Clinics.