

## Griffith Health Intramural Professional Practice Policy

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<b>Description</b>	This Policy outlines the decision-making principles underpinning approval and conduct of intramural professional practice <sup>1</sup> for Griffith Health staff. The term "professional practice" used throughout the document refers to discipline-based healthcare practice.

### 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 Guidelines to Conduct Clinical Practice within the Griffith Health Clinics](#)

[Private Practice Policy](#)

### External Links:

[Dental Technicians Registration Act 2001](#)

[\[Introduction\]](#) [\[Guiding Principles\]](#) [\[Principles Underpinning Provision of Treatment to Patients/Clients from Health Group-run clinic facilities\]](#) [\[Administration and Disbursement of Income\]](#) [\[Insurance\]](#) [\[Process for approval of intramural practice\]](#) [\[Performance Management of Intramural Professional Practice\]](#) [\[Dissatisfied Patients/Clients\]](#) [\[Leave and Cessation of Intramural Professional Practice\]](#) [\[Practitioner Responsibilities to Meet and Maintain Pre-Practice Requirements\]](#) [\[Reporting\]](#) [\[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 This Policy applies to staff of the Griffith Health Group who are approved (in accordance with Section 6 of this policy) to engage in the delivery of clinical healthcare services from within Health Group-run clinics as a component of their University workload profile. This policy **does not apply** to:
  - 1.1.1 Griffith staff wishing to undertake professional practice within Health Group-run clinics which is outside of their University workload profile (refer to the 'Private Practice Policy'); or

<sup>1</sup> Intramural professional practice means professional healthcare-related practice undertaken by approved staff of Griffith Health **within** the staff member's assigned University workload, and **within** Health Group-run facilities (e.g., clinics and health services).

- 1.1.2 Griffith staff wishing to undertake professional practice in settings other than Health Group-run health clinics (refer to the 'Private Practice Policy'); or
- 1.1.3 Non-clinical Griffith staff seeking to carry out activities in external settings (refer to the 'Consultancy and Commercial Research Policy').

All staff undertaking activities under this Policy, 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 this Policy. In the event of any inconsistency between this Policy and the Schedules to this Policy, the Policy will apply unless some other school specific arrangements have been approved by the PVC (Health) and the Deputy Vice Chancellor (Academic).

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## 2. GUIDING PRINCIPLES

In addition to the Guiding Principles outlined in the Consultancy, and Commercial Research Policy, the Griffith Health Intramural Professional Practice Policy 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 possess be available through the Griffith Health Clinics to benefit the community at large.
- 2.3 The Health Group endorses and encourages 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 Intramural professional practice is available to approved staff who:
  - 2.5.1 need to maintain clinical/professional credentials: and/or
  - 2.5.2 can contribute to the viable operation of Health Group-run health clinics through their professional practice.
- 2.6 A proportion of the practice fees which are collected in return for the provision of intramural professional 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 professional practice. These percentages/charges will be determined by the University and the Group in accordance with the principles outlined in the relevant Schedule to this policy.
- 2.7 Intramural professional 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 professional practice. Should the University determine that a staff member's intramural professional practice is not self-supporting, approval for the staff member to conduct intramural professional practice will be reviewed and may be withdrawn in accordance with clause 6.6.
- 2.8 Basic services will be provided by the University to support intramural professional practice. Basic services, and services outside of the scope of what will be provided by the University are listed in Appendix 1.

- 2.9 Workload allocation for professional practice (including intramural professional practice) is a matter of consultation between the staff member and the Head of School. Engagement in intramural professional practice will be acknowledged within the staff member's work allocation. Intramural professional practice will normally constitute load for scholarship, research and/or service dependent on the nature of the practice undertaken, but will not normally incur a reduction in teaching load in the School, except where the professional practice is conducted within a teaching context involving scheduled student teaching activities (e.g., demonstrating clinical skills to students or supervising students undertaking clinical activities).
- 2.10 The extent of intramural professional practice will not normally exceed 200 hours for a full-time appointee in a six month period, or proportionately less in the event that a staff member is employed on a fractional basis however the University reserves the right to exceed this amount if benefit to the University is determined. Staff members are expected to undertake all work associated with their intramural professional practice in the time allocated, without detriment to their other workload requirements (including teaching, scholarship, research and service). Intramural professional practice must not compromise the staff member's availability and capacity to perform their other assigned University duties, including all assigned teaching duties, commensurate with their appointment fraction.
- 2.11 Intramural professional practice will be conducted so as to:
- 2.11.1 be consistent with the philosophy and aims of the University and the Griffith Health Clinics;
  - 2.11.2 deliver a demonstrable benefit to the University;
  - 2.11.3 develop and enhance, and not to harm in any way, the reputation and standing of the University;
  - 2.11.4 where practicable, contribute to the advancement of learning, research, scholarship and the clinical reputation of the University.
  - 2.11.5 not compete with the existing business of the Griffith Health Clinics
- 2.12 Intramural professional practice must only be undertaken by a staff member for the scope of work for which the staff member is:
- 2.12.1 professionally registered to practise with the relevant Registration Board; and
  - 2.12.2 approved to practise by the Griffith Health Clinics Privileging Committee.
- 2.13 Intramural professional practice should not compete with other University business.
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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 intramural professional practice will be determined by the Health Group in accordance with the Griffith Health Clinics Fee Charging Policy.
- 4.2 Once treatment fee schedules have been determined, the staff member undertaking the intramural professional 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.
- 4.3 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 staff member's private provider number must be displayed on the invoice.
- 4.4 The costs associated with a staff member's delivery of intramural professional 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 staff member, or alternatively may be recovered directly from the fees collected by the University from patients/clients before the disbursement of income to the staff member occurs (in accordance with the relevant Schedule to this policy).
- 4.5 The University reserves the right to levy either an appropriate percentage of income generated by a staff member's intramural professional practice and/or a flat fee per hour through which costs incurred by the University in supporting the intramural professional practice may be recovered. Fees/charges recovered by the University will be determined by the University as indicated in the relevant schedule to this policy, taking into consideration 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 staff member's intramural professional practice, the University may impose a charge on the staff member to meet the costs incurred by the University.
  - 4.5.1 The PVC (Health) will determine, in accordance with the relevant schedule to this policy, 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 staff members undertaking intramural professional practice.
  - 4.5.2 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 staff members undertaking intramural professional practice.
  - 4.5.3 It is a condition of the right of intramural professional practice that staff members 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.
- 4.6 Staff undertaking intramural professional 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.
- 4.7 Income collected by the University (Group or School) from intramural professional practice, after University, Group and host School deductions have been made, can be used by staff to support their academic role (e.g., attendance at conferences) or taken in full or part as salary (note income collected by the University may only be taken as salary at the time that it is disbursed by the University to the practitioner following the quarterly reconciliation of clinic finances).

- 4.8 Income collected directly by the practitioner from patients/clients is the responsibility of the practitioner.
  - 4.9 It is the responsibility of the staff member 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.
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## **5. INSURANCE**

- 5.1 Staff undertaking intramural professional practice (i.e., professional practice that is an approved component of their University workload profile) will be covered under the University's insurance policies for their intramural professional practice. Staff who are undertaking professional practice outside of their approved University workload and/or at sites other than Health Group-run clinics (i.e., professional practice other than intramural professional practice) should hold and maintain their own insurance (including public liability, professional indemnity and medical malpractice insurance where applicable) to cover their non-intramural professional practice activity.
  - 5.2 It is the responsibility of the staff member to ensure that any insurance coverage obtained privately is up to date and a copy of this is provided to the University.
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## **6. PROCESS FOR APPROVAL OF INTRAMURAL PROFESSIONAL PRACTICE**

- 6.1 A staff member seeking approval to undertake intramural professional practice must submit for endorsement a completed Application for Clinical Privileges in Griffith Health Clinics clearly indicating that approval is sought to undertake intramural professional practice to:
  - 6.1.1 the Director/Lead of the respective Griffith Health Clinic in which they are seeking to practice; followed by
  - 6.1.2 their Head of School; followed by
  - 6.1.3 the Griffith Health Clinical Privileging Committee.

At each stage of 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 clinician 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). Heads of School are authorised to determine the extent (if any) to which intramural professional practice may be made available to staff within their School, considering staff and financial resource implications to the School.

- 6.2 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 intramural professional practice, a copy of the full application and committee recommendations will be forwarded to the PVC (Health) for a final consideration of the application to conduct intramural professional practice and a decision regarding privileges to be awarded to the staff member to conduct intramural professional practice;
- 6.4 The staff member 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 staff members to undertake intramural professional practice may be given for up to three years at a time though continued privileges are reviewed on an annual basis in accordance with clause 7. At the satisfactory conclusion of an approved term of intramural professional practice, the staff member may reapply for approval to undertake a further term of intramural professional 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 any staff member's right of intramural professional practice.
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## **7. PERFORMANCE MANAGEMENT OF INTRAMURAL PROFESSIONAL PRACTICE**

- 7.1 Approved intramural professional practice arrangements will be reviewed:
    - 7.1.1 by the Clinical Privileging Committee (or a delegated sub-committee) at least annually or at any other time as deemed appropriate by the Committee; and,
    - 7.1.2 by the staff member's Head of School in consultation with the Clinic Director/Lead as part of the annual performance review process..
  - 7.2 Staff approved to undertake intramural professional practice will report on the performance of their intramural professional practice through the annual Academic Staff Review Process under the workload category(s) in which they have been approved to undertake intramural professional practice.
  - 7.3 If, in the event a staff member's intramural professional practice activities are deemed unsatisfactory, conditions of clinical privileging awarded by the PVC (Health) are not complied with, or the conduct of the intramural professional practice becomes in conflict with any clause of this policy, the PVC (Health) reserves the right to invoke section 6.6 whereby the rights of intramural professional practice may be reduced or withdrawn.
  - 7.4 An annual statement outlining approved professional practice undertaken by 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.
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## **8. DISSATISFIED PATIENTS/CLIENTS**

- 8.1 Where a patient/client is dissatisfied with the standard of treatment provided by a staff member undertaking intramural professional practice, 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 intramural professional practice may be reduced, suspended or withdrawn during a review of a complaint from a dissatisfied patient/client. The staff member involved must however continue to participate in the investigation and review of the complaint.
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## **9. LEAVE AND CESSATION OF INTRAMURAL PROFESSIONAL PRACTICE**

- 9.1 Staff members engaged in intramural professional practice should inform their supervisor, the relevant clinic lead and the clinic reception of any annual or other planned leave at least four weeks in advance of taking leave.
- 9.2 The staff member 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 staff member must inform the clinic reception as soon as is practicable in accordance with the relevant clinic policy, procedures or guideline.

- 9.4 At cessation of intramural professional practice the staff member 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 staff member 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 intramural professional practice (in accordance with the University's Conflict of Interest policy);
- 10.2 The staff member must be able to produce evidence that they hold current clearances with respect to pre-practice requirements, and must notify their Head of School, 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.
- 10.3 In the event that there are any changes in the status of a staff member who has been approved to undertake intramural professional practice with respect to meeting or maintaining pre-practice requirements which in the Group's discretion would impact the staff member's ability to continue to undertake intramural professional practice, the Group reserves the right to invoke section 6.6 whereby the rights of intramural professional practice 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) Intramural professional practice is available to appropriately authorised staff of the School of Dentistry and Oral Health who are registered as a Dental Practitioner registered with the Dental Board of Australia (AHPRA).

### **Administration and Disbursement of Income**

- 2) Staff members granted rights of intramural professional practice will receive 40% of the net earnings<sup>2</sup> 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.
- 3) Technical laboratory fees may be costed directly to a patient/client in addition to the standard fee schedule.
- 4) At the end of each quarter, the relevant clinic administrator will reconcile all intramural professional practice receipts for that quarter, and determine the appropriate amount to be paid to the relevant staff member. The staff member will be asked to invoice the Clinic for the 40% of collected fees for the quarter.

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<sup>2</sup> Net earnings - means the fee charged for a specific treatment by a staff member undertaking intramural professional 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) Intramural professional practice is available to appropriately authorised staff of the School of Allied Health Sciences 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 Dietician, 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) Staff members granted rights of intramural professional practice will be charged:
  1. a flat per-hour fee for use of clinic space<sup>3</sup> <sup>4</sup>.; plus
  2. 35% of net earnings<sup>5</sup> from patient fees.
- 3) At the end of each quarter, the relevant clinic administrator will reconcile all intramural professional practice receipts for that quarter, and determine the appropriate amount to be paid to the relevant staff member.

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<sup>3</sup> 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).

<sup>5</sup> Net earnings - means the fee charged for a specific treatment by a staff member undertaking intramural professional practice, less the cost of clinic space.

## **SCHEDULE 3 - PSYCHOLOGY CLINIC**

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

### **Administration and Disbursement of Income**

- 2) Staff members granted rights of intramural professional practice will be charged a flat per-hour fee charge for use of clinic space<sup>6</sup>. Practitioners will be responsible for collecting client fees, and managing the administration of their practice.
- 3) The clinician will reimburse the University at the end of each month for the rooms booked during the month.
- 4) The Clinic administrator will reconcile all intramural professional practice room bookings at the end of each quarter, and ensure the appropriate amount was paid by the relevant staff member to the University.

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<sup>6</sup> 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 intramural professional practice:**

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

### **Limitations to services provided by the Griffith Health Clinics to support intramural professional practice or 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 intramural professional practice or 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 intramural professional practice or private practice clinics. The responsibility for recruiting patients/clients to an intramural professional practice or 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' intramural professional 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 intramural professional practice or 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.