



Consumers
Health Forum
of Australia

2 November 2012

Accreditation Review
Australian Health Practitioner Regulation Agency
Via email: accreditationreview@ahpra.gov.au

Dear Sir/Madam

Review of accreditation arrangements – submission on multiple consultation papers

The Consumers Health Forum of Australia (CHF) welcomes the opportunity to provide a submission to the review of accreditation arrangements being undertaken by the Chiropractic Board of Australia, Medical Board of Australia, Optometry Board of Australia, Osteopathy Board of Australia, Pharmacy Board of Australia, Physiotherapy Board of Australia, Podiatry Board of Australia and Psychology Board of Australia.

CHF is the national peak body representing the interests of Australian healthcare consumers. CHF works to achieve safe, quality, timely healthcare for all Australians, supported by accessible health information and systems. As such, CHF's primary concern is that consumer views are taken into account at every level of decision making regarding their healthcare and the wider health system.

CHF has noted wide disparity in consumer and community involvement in the governance and work of the Accreditation Councils. Ideally we would like to see far greater consistency, with those Accreditation Councils which have lower levels of consumer and community participation increasing the level of participation.

Comments are provided below in a format consistent with the consultation form provided for submissions.

CHF appreciates the opportunity to provide a submission to this consultation. If you would like to discuss these comments in more detail, please contact CHF Deputy Chief Executive Officer, Anna Greenwood.

Yours sincerely

Carol Bennett
CHIEF EXECUTIVE OFFICER

Review of Accreditation Council against the Quality Framework for the Accreditation Function

5.1 Governance (Domain 1)

The Accreditation Council effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role

Attributes

- The Accreditation Council is a legally constituted body and registered as a business entity.
- The Accreditation Council's governance and management structures give priority to its accreditation function relative to other activities (or relative to its importance).
- The Accreditation Council is able to demonstrate business stability, including financial viability.
- The Accreditation Council's accounts meet relevant Australian accounting and financial reporting standards.
- There is a transparent process for selection of the governing body.
- The Accreditation Council's governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s.
- The Accreditation Council's governance arrangements comply with the National Law and other applicable legislative requirements.

Consumers Health Forum response

CHF's primary interest in relation to the governance of each of the Accreditation Councils is whether they provide for input from stakeholders including consumers and the community, and whether consumers or community members are directly involved in organisational governance. CHF has reviewed the individual Accreditation Council submissions and has noted wide variation in the level of consumer/community engagement. Further details are below.

Council on Chiropractic Education Australasia:

Two positions on the Board are designated for members who are 'an independent person in education, business or the community, who represents the public and who is experienced in processes of evaluation, accreditation and wise governance'. This arrangement could result in no consumer or community membership of the Board, as these positions could go to people involved in education or business. A designated position or positions for consumer or community representation would be welcome.

Australian Medical Council

The Australian Medical Council (AMC) demonstrates a strong commitment to consumer and community participation in its governance. There are designated positions for consumer/community representatives on the AMC and on its advisory committees.

Optometry Council of Australia and New Zealand

There is a designated position for a community member on the Board.

Australian and New Zealand Osteopathic Council

There are three designated positions for community members on the Board, and other committees have positions for 'laypeople'.

Australian Pharmacy Council

There are two community representatives on the APC Board and operational committees, and the submission notes that governance arrangements provide for input from stakeholders, including the community.

Australian Physiotherapy Council

External community representatives can attend the Annual General Meeting as observers. The Board can appoint skills-based directors, which could include a consumer (described as a 'non-physiotherapist').

Australian and New Zealand Podiatry Accreditation Council

There are two consumer representatives on the Board, and interest groups and committees also include consumers.

Australian Psychology Accreditation Council

There is currently one community representative on the Board. The submission acknowledges the need to consider increasing community representation on the Board, and review nomination processes for community representatives.

5.2 Independence (Domain 2)

The Accreditation Council carries out its accreditation operations independently

Attributes

- Decision making processes are independent and there is no evidence that any area of the community, including government, higher education institutions, business, industry and professional associations - has undue influence.
- There are clear procedures for identifying and managing conflicts of interest.

Consumers Health Forum response

CHF has no specific comments to make in relation to the independence of the Accreditation Councils.

5.3 Operational Management (Domain 3)

The Accreditation Council effectively manages its resources to carry out its accreditation function

Attributes

- The Accreditation Council manages the human and financial resources to achieve objectives in relation to its accreditation function.
- There are effective systems for monitoring and improving the authority's accreditation processes, and identification and management of risk.
- The authority can operate efficiently and effectively nationally.
- There are robust systems for managing information and contemporaneous records, including ensuring confidentiality.
- In setting its fee structures, the Accreditation Council balances the requirements of the principles of the National Law and efficient business processes.

Consumers Health Forum response

CHF has no specific comments to make in relation to the operational management of the Accreditation Councils.

5.4 Accreditation standards (Domain 4)

The Accreditation Council develops accreditation standards for the assessment of programs of study and education providers

Attributes

- Standards meet relevant Australian and international benchmarks.
- Standards are based on the available research and evidence base.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The Accreditation Council reviews the standards regularly.
- In reviewing and developing standards, the Accreditation Council takes account of AHPRA's Procedures for Development of Accreditation Standards and the National Law.

Consumers Health Forum response

CHF's primary interest in relation to accreditation standards is whether stakeholders, including consumers and the community, are involved in their development and/or review. CHF has reviewed the individual Accreditation Council submissions and has noted wide variation in the level of consumer/community involvement in development/review of accreditation standards.

Council on Chiropractic Education Australia

The submission makes reference to stakeholder consultation in the review of the accreditation standards, and reference is also made to consumer consultation in specific review projects.

Australian Medical Council

The submission refers to stakeholder consultation in the review of accreditation standards. CHF is aware of efforts by the AMC to include consumer and community members in stakeholder consultation on accreditation standards.

Optometry Council of Australia and New Zealand

CHF could not locate any information in the submission regarding stakeholder involvement (including consumer or community involvement) in the development or review of accreditation standards.

Australian and New Zealand Osteopathic Council

The submission refers to stakeholder consultation in the review of accreditation standards.

Australian Pharmacy Council

The submission refers to stakeholder consultation in the review of accreditation standards.

Australian Physiotherapy Council

The submission does not refer to consultation with consumers or community members, but CHF has provided input to Australian Physiotherapy Council consultations on accreditation standards.

Australian and New Zealand Podiatry Accreditation Council

The submission refers to stakeholder consultation in the review of accreditation standards.

Australian Psychology Accreditation Council

The submission refers to stakeholder consultation in the review of accreditation standards.

5.5 Processes for accreditation of programs of study and education providers (Domain 5)

The Accreditation Council applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers

Attributes

- The Accreditation Council ensures documentation on the accreditation standards and the procedures for assessment is publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. Its policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess professional programs of study and their providers against the accreditation standards.
- There are procedures for identifying, managing and recording conflicts of interest in the work of accreditation assessment teams and working committees.
- The Accreditation Council follows documented processes for decision-making and reporting that comply with the National Law and enable decisions to be made free from undue influence by any interested party.
- Accreditation processes facilitate continuing quality improvement in programs of study by the responsible education provider.
- There is a cyclical accreditation process with regular assessment of accredited education providers and their programs to ensure continuing compliance with standards.
- The Accreditation Council has defined the changes to programs and to providers that may affect the accreditation status, how the education provider reports on these changes and how these changes are assessed.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Consumers Health Forum response

CHF notes that some of the Accreditation Councils involve consumers and/or community members in their assessment teams. CHF welcomes the inclusion of consumers/community members, provided that they are provided with the necessary support and information to undertake this role.

Council on Chiropractic Education Australia

Accreditation team members may be drawn from 'the community at large'.

Australian Medical Council

Accreditation team members may include community members and health consumers. Their submission refers to workshops for consumer and community accreditation team members to support them in their role.

Optometry Council of Australia and New Zealand

Accreditation teams appear to be composed of academics and optometrists only.

Australian and New Zealand Osteopathic Council

Accreditation team members may be drawn from 'the community at large'.

Australian Pharmacy Council

There is no reference in the submission to consumer or community participation in accreditation teams.

Australian Physiotherapy Council

There is no reference in the submission to consumer or community participation in accreditation teams.

Australian and New Zealand Podiatry Accreditation Council

Accreditation team members may be drawn from 'the layperson community at large'.

Australian Psychology Accreditation Council

There is no reference in the submission to consumer or community participation in accreditation teams.

5.6 Assessing authorities in other countries (than Australia) (Domain 6)

Where this function is exercised by the Accreditation Council, the authority has defined standards and procedures to assess examining and/or accrediting authorities in other countries

Attributes

- The assessment standards aim to determine whether these authorities' processes result in practitioners who have the knowledge, clinical skills and professional attributes necessary to practice in the equivalent profession in Australia.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The procedures for initiating consideration of the standards and procedures of authorities in other countries are defined and documented.
- There is a cyclical assessment process to ensure recognised authorities in other countries continue to meet the defined standards.
- The Accreditation Council follows documented systems for decision-making and reporting that enable decisions to be made free from undue influence by any interested party.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Consumers Health Forum comments

CHF has no specific comments to make in relation to the Accreditation Councils' assessments of accrediting authorities in other countries.

5.7 Assessing overseas qualified practitioners (Domain 7)

Where this function is exercised by the Accreditation Council, the authority has processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of overseas qualified practitioners who are seeking registration in the profession under the National Law and whose qualifications are not approved qualifications under the National Law for the profession

Attributes

- The assessment standards define the required knowledge, clinical skills and professional attributes necessary to practise the profession in Australia.
- The key assessment criteria, including assessment objectives and standards, are documented.
- The Accreditation Council uses a recognised standard setting process and monitors the overall performance of the assessment.
- The procedures for applying for assessment are defined and published.
- The Accreditation Council publishes information that describes the structure of the examination and components of the assessments.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessors. Its policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess overseas qualified practitioners.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Consumers Health Forum response

CHF has no specific comments to make in relation to the assessment of overseas trained practitioners by the Accreditation Councils.

5.8 Stakeholder collaboration (Domain 8)

The Accreditation Council works to build stakeholder support and collaborates with other national, international and/or professional accreditation authorities

Attributes

- There are processes for engaging with stakeholders, including governments, education institutions, health professional organisations, health providers, national boards and consumers/community.
- There is a communications strategy, including a website providing information about the Accreditation Council's roles, functions and procedures.
- The Accreditation Council collaborates with other national and international accreditation organisations.
- The Accreditation Council collaborates with accreditation authorities for the other registered health professions appointed under the National Law.
- The Accreditation Council works within overarching national and international structures of quality assurance/accreditation.

Consumers Health Forum comments

CHF's primary interest in relation to stakeholder collaboration is how Accreditation Councils engage with consumers and the community. CHF has reviewed the individual Accreditation Council submissions and has noted wide variation in the level of detail provided regarding consumer/community engagement.

Council on Chiropractic Education Australia

Information is provided in the submission about stakeholder collaboration generally, but no detail is provided on collaboration or engagement with consumers or community members.

Australian Medical Council

The submission outlines strategies that are in place to engage with consumer and community stakeholders.

Optometry Council of Australia and New Zealand

Information is provided in the submission about stakeholder collaboration generally, but no detail is provided on collaboration or engagement with consumers or community members.

Australian and New Zealand Osteopathic Council

Information is provided in the submission about stakeholder collaboration generally, but no detail is provided on collaboration or engagement with consumers or community members.

Australian Pharmacy Council

The submission outlines strategies that are in place to engage with consumer and community stakeholders, though this is currently limited to consumer/community membership of the Board and operational committees.

Australian Physiotherapy Council

The submission notes plans to include community engagement in future work.

Australian and New Zealand Podiatry Accreditation Council

Information is provided in the submission about stakeholder collaboration generally, but no detail is provided on collaboration or engagement with consumers or community members.

Australian Psychology Accreditation Council

Information is provided in the submission about stakeholder collaboration generally, but no detail is provided on collaboration or engagement with consumers or community members.

Preliminary conclusion of the National Board about whether current arrangements are satisfactory

The National Boards have undertaken a preliminary review of the current arrangements, including an analysis of risks, benefits and costs. The review was based on the submissions provided by the Council against the Quality Framework for the Accreditation Function as referenced in section 5 above and the Board's experience working with the Council over the last two years.

Consumers Health Forum comments

CHF notes that the National Boards have made preliminary conclusions that current accreditation arrangements should continue with each of the existing Accreditation Councils, for varying periods and with provisos in some cases.

While CHF is not opposed to the continuation of current arrangements, we note the wide disparity in consumer and community involvement in the governance and work of the Accreditation Councils. Ideally we would like to see far greater consistency, with those Accreditation Councils which have lower levels of consumer and community participation increasing the level of participation.

Consumers and community members arguably have a strong interest in accreditation, as ultimately it affects the safety and quality of health professional practice. It is therefore essential that they have a voice in the governance and functions of the Accreditation Councils.