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**Australasian Podiatry Council**

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Browyn Nardi  
Chair  
Practitioner Regulation Subcommittee  
Of the Health Workforce Principal Committee

## ACCREDITATION ARRANGEMENTS SUBMISSION

Following are responses from by the Australasian Podiatry Council to issues raised in the *CONSULTATION PAPER - Proposed arrangements for accreditation* have been addressed.

Should you have any queries on this submission, I can be contacted on 03 94163111 and [kelli@apodc.com.au](mailto:kelli@apodc.com.au).

Yours sincerely

**Kelli Cheales**  
CEO  
Australasian Podiatry Council

17<sup>th</sup> December 2008

## **APodC – Comments on proposals contained in “Consultation Paper – Proposed arrangements for accreditation” – 15 December 2008**

**Proposal 3.4.1:** It is proposed that in preparation for commencement of the national scheme, national boards will consider whether there is a need for specialist endorsements in their profession.

**APodC Comment:** Agree.

The range of professional titles currently utilised across Australia for podiatry are:

- Podiatrist
- Surgical Podiatrist
- Chiropodist
- Podiatry Physician
- Podiatric Surgeon
- Podiatric Proceduralist
- Podiatry Assistant
- Foot Care Assistant
- Podiatry Nurse
- Foot Carer

APodC strongly recommends that these titles for health professionals in podiatry are maintained.

Podiatric surgeons are registered podiatrists who have undergone extensive postgraduate training in podiatric medicine and surgery and have successfully completed the requirements for admission to the the Australasian College of Podiatric Surgeons (ACPS). The categories of membership for the ACPS:

- Registrar
- Fellow

This reflects the different stages in study and learning required to become and practice as a podiatric surgeon in Australia. Additional information on the requirements for the training and accreditation arrangements can be accessed from the Australasian College of Podiatric Surgeons (ACPS) <http://www.acps.edu.au>.

There following areas of specialisation in podiatry should also be maintained:

- Sport
- Diabetic educator
- Prescribing
- Diagnostics
- High risk foot
- High risk surgery
- Debridement

- Custom made orthoses
- Custom footwear

**Proposal 3.4.2:** In the case of the medical profession, it is proposed that the national board take advice from the Australian Medical Council on the list of specialties and associated specialist qualifications, against which the board could endorse individual registrants as specialists.

**APodC Comment:** Fully supports the role of the Australian Medical Council with the specialist colleges for medical practitioners.

**Proposal 3.4.3:** It is proposed that in line with the IGA the national scheme legislation will provide that while boards may approve the initial list of specialties, any new specialties or specialty areas of practice will require Ministerial Approval.

**APodC Comment:** Agree. APodC recommends that any proposal for the inclusion of a new specialisation be put through a rigorous analysis of the costs and benefits of such an inclusion as those required by government in a Regulatory Impact Statement. Application for new specialisations should address the relevant postgraduate or vocational education, standards and accreditation requirements for the proposed new specialisation.

**Proposal 3.4.4:** It is proposed that the Ministerial Council specify that the core accreditation functions initially assigned to the external accreditation bodies are the core functions listed above where those functions are currently undertaken by the body.

**APodC Comment:** APodC acknowledges that the core functions for accreditation are addressed under Proposal 3.4.4. In recognition of the cost of accreditation functions, APodC must acknowledge the additional cost of accreditation to the profession under the implementation of the IGA as previously these costs have not been financially supported by professional registration fees..

**Proposal 3.4.5:** It is proposed that the Ministerial Council specify that it would be open to boards to delegate to external accreditation bodies or committees other functions related to accreditation or other matters for which the boards have the responsibility, but the boards would not be required to do so.

**APodC Comment:** Agree.

**Proposal 3.4.6:** It is proposed that the national scheme legislation allows for changes and expansion of the range of courses accredited with any such expansion requiring the approval of the relevant standards by the Ministerial Council.

**APodC Comment:** APodC supports the notion of the introduction of new courses if the need is fully developed utilising the process detailed in APodC's comment regarding Proposal 3.4.3.

**Proposal 3.4.7:** It is proposed that the legislation provide general powers of delegation to boards allowing them to delegate other functions to external accreditation bodies where they consider this is the best way to achieve the objectives of the national scheme and where this is consistent with their powers under the legislation.

**APodC Comment:** Agree.

**Proposal 3.5.1:** It is proposed that the agency's requirements in relation to the national scheme should be specified in the contract with the specific accreditation body.

**APodC Comment:** Agree.

**Proposal 3.5.2:** It is proposed that the terms of the contracts between the agency and the external accrediting body include but are not limited to, the following matters:

- (a) The objectives of the national scheme
- (b) The accreditation framework standards developed by the agency
- (c) The budget for the accreditation functions it is performing for the national board
- (d) The contribution to the cost of those functions to be drawn from registration fees
- (e) Monitoring and reporting arrangements
- (f) Requirements relating to contributions to the national board's annual report, and
- (g) Provisions relating to termination of the contract.

**APodC Comment:** Agree. APodC believes that contracts should include a variation clause, due to the highly variable nature of the frequency of accreditation functions performed by an accreditation body.

**Proposal 3.5.3:** It is proposed that the arrangements between the agency and any external accreditation body form part of the health profession agreement between the agency and each national board, providing both the national board and the agency with input to the arrangements.

**APodC Comment:** Agree.

**Proposal 3.5.4:** It is proposed that the national scheme legislation provide that the agency must consult with the boards on the development of standard to govern registration and accreditation processes within the scheme.

**APodC Comment:** Agree. APodC believes that these standards should be developed, and should not impose conditions on accreditation bodies that are overly onerous, overly irrelevant or overly costly.

**Proposal 3.5.5:** It is proposed that the external body assigned to undertake accreditation in the first three years will have the ability to delegate parts of the accreditation function to other agencies, while it remains responsible for the overall function, where there is no conflict of interest and where this was the arrangement at the time when the accreditation function was assigned.

**APodC Comment:** Agree.

**Proposal 3.5.6:** As per Bill A, it is proposed that the national scheme legislation provide that the accreditation bodies and committees of the national board be required to consult widely when developing standards for accreditation.

**APodC Comment:** Agree. APodC recommends that the WHO/WFME Guidelines for Accreditation of Basic Medical Education are fully implemented in the development of standards for accreditation.

**Proposal 3.5.7:** It is proposed that the national scheme legislation provide that the agency be required to publish on its website, the standards for accreditation following approval by the Ministerial Council as well as all fees and charges related to accreditation.

**APodC Comment:** APodC believe that standards should be available to those seeking accreditation, and that fees and charges should relate to criteria regarding specific projects, or to items detailed in the contract between the agency and the external accreditation body.

**Proposal 3.5.8:** It is proposed that the contract with the external accreditation body require that body to provide information to the national board on financial reports pertaining to accreditation functions, activities undertaken during the year, including standards developed, courses accredited or monitored, the number of qualifications assessments of overseas trained practitioners undertaken and the decisions made as a result of these assessments, and anything else required by the national board, for the inclusion in the agency's annual report.

**APodC Comment:** Agree.

**Proposal 3.6.1:** It is proposed that the Ministerial Council require that accreditation committees comprise two registered practitioners from the relevant profession, two members with education and training expertise, two community members and two representatives from the relevant national board.

**APodC Comment:** APodC believes that the committee should total an odd number of members, in order to better facilitate decision making should a voting process be required. APodC recommends that the committee members with education and training expertise should be registered under the relevant profession.

Furthermore, APodC believes that members who are registered practitioners should not have sat on a registration board for at least five years before being appointed to an accreditation committee.

**Proposal 3.6.2:** It is further proposed that the Ministerial Council require that the relevant national board appoint an accreditation committee chair from among these members.

**APodC Comment:** APodC again recommends the need for an uneven number of members, including the chair to the accreditation committee.

As there are possible conflicts of interest from members with education and training experience, as well as the inappropriateness of committees being chaired by community members or registration board members, it is recommended that accreditation committees are chaired by a registered practitioner from the relevant profession.

**Proposal 3.6.3:** It is also proposed that the Ministerial Council require that the process by which the national board selects members for an accreditation committee be open and transparent.

Positions should be advertised and allow for expressions of interest from individuals and nominations from groups.

**APodC Comment:** APodC supports an open and transparent process for the notification of positions and the selection process for members of the accreditation committees, with key criteria for applicants being developed and used for this purpose.

**Proposal 3.6.4:** It is proposed that the legislation will give general delegations powers to boards allowing them to delegate other functions to agency staff and committees, as well as external accreditation bodies, where they consider this is the best way to achieve the objects of the national scheme and it is consistent with their powers under the legislation.

**APodC Comment:** Agree. APodC will make comments regarding delegation issues in responding to the “Other Matters” consultation paper.

**Proposal 3.7.1:** It is proposed that any organisation disadvantaged by an accreditation decision of the board should have the right to seek a merit or process review and, if required, go beyond that to an external process of review.

**APodC Comment:** APodC would like to seek clarification as to at what level (agency or board) an appeals process would take place.

APodC recommends that any board members sitting in on an appeals process in an official function would not be members of the accreditation committee.

**Proposal 3.8.1:** It is proposed that the national scheme legislation will provide that all bodies and their agents under the scheme will be indemnified for work performed in relation to the scheme. These indemnity arrangements will extend to external accreditation bodies and committees and persons acting for those bodies and committees.

**APodC Comment:** Agree.

**Proposal 3.10.1:** It is proposed that the Ministerial Council request that the agency consider the following matters in developing standards for accreditation processes:

- (a) the document Standards for Professional Accreditation Processes developed by ‘Professions Australia’ in consultation with the Forum of Health Professions Councils
- (b) the need to meet any relevant international guidelines relating to the specific professions
- (c) the need to align standards with relevant international standards and clearly indicate the international standards on which these standards are based when presenting them to boards for consideration, and
- (d) the need to ensure that accreditation assessment panels provide sufficient public accountability and independence.

**APodC Comment:** Agree.

**Proposal 3.10.2:** It is proposed that the legislation provides for ongoing monitoring of education courses and institutions, including requiring accredited education providers to report to the accreditation body or committee any significant curricular changes or resourcing issues that would adversely impact on students and compromise their ability to register.

**APodC Comment:** Agree.

**Proposal 4.1:** It is proposed that accreditation reports will be made publicly available in the agency's annual report and on its website. These reports will include recommendations and outcomes of accreditation processes and information on education and training outcomes.

**APodC Comment:** Agree.

**Proposal 5.1:** It is proposed that the national scheme legislation provide that standards for accreditation are developed in consultation with New Zealand and any other country with which Australia has (or develops) a mutual recognition agreement.

**APodC Comment:** Agree.

**Proposal 6.1:** It is proposed that the transitional arrangements to be included in the national scheme legislation will include requirements for:

- (a) current boards to provide the new national boards with their lists of accredited courses prior to the commencement of the national scheme
- (b) standards for courses or education providers which exist on 30 June 2010, to continue until they are replaced with standards developed under the national scheme and approved by the Ministerial Council
- (c) education and training courses and education provider which are accredited by the current boards on 30 June 2010 to be deemed to be accredited under the national scheme until they have been re-accredited under the new provisions, and
- (d) lead times of at least one full year for the introduction of any new accreditation standards following approval by the Ministerial Council to allow course providers to make any required changes to their courses.

**APodC Comment:** Agree.