

**THE PHARMACEUTICAL COUNCIL  
OF WESTERN AUSTRALIA**

R J BRENNAN  
REGISTRAR



21 Hamilton Street  
SUBIACO WA 6008  
Telephone: (08) 9388 2886  
Facsimile: (09) 9388 290  
E-Mail: [pcwa@inet.net.au](mailto:pcwa@inet.net.au)  
Website: [www.pcwa.com.au](http://www.pcwa.com.au)

**Accreditation Arrangements Submission**  
**Attention: Practitioner Regulation Subcommittee**

**Electronic Submission**

Attached is this Council's response to your invitation to comment on the consultation paper on proposed accreditation arrangements.

Thank you for the opportunity to comment.

Yours sincerely

A handwritten signature in black ink, appearing to read 'R J Brennan', is written over a light blue horizontal line.

R J Brennan  
Registrar  
12 December 2008

**NATIONAL REGISTRATION AND ACCREDITATION SCHEME  
FOR THE HEALTH PROFESSIONS**

**PHARMACEUTICAL COUNCIL OF WESTERN AUSTRALIA RESPONSE TO**

**CONSULTATION PAPER**

**Proposed arrangements for accreditation**

Pharmaceutical Council of Western Australia  
21 Hamilton Street  
SUBIACO WA 6008

Tel: 08 9388 2886  
Email: [pcwa@iinet.net.au](mailto:pcwa@iinet.net.au)

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**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.

**Support**

**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 Council approval.

**Support**

**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.

**Support**

**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 responsibility, but the boards would not be required to do so.

**Support**

**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.

**Support**

**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.

**Support**

Stakeholders are invited to provide comment on how the guidance to be provided on the governing body of external accrediting bodies can provide for community input and input from education providers and professions but provide independence in decision-making.

**At least two community representatives and one representative of the education providers could be appointed to the Australian Pharmacy Council (APC). Committees undertaking the work of the APC should have at least two community representatives and a suitable number of education provider representatives.**

**Any assessment team undertaking accreditation should have at least one education provider representative (not from the institution being accredited), community pharmacist, hospital pharmacist and secretarial support. Reports and recommendations from the assessment team should be submitted to the APC via the committee.**

**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.

**Support**

**Proposal 3.5.2:** It is proposed that the terms of 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
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- (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.

**Support**

**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.

**Support**

**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 the standards to govern registration and accreditation processes within the scheme.

**Support**

**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 the accreditation function was assigned.

**Support**

**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.

**Support**

**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.

**Support**

**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 requested by the national board, for inclusion in the agency's annual report.

**Support**

**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.

**Support** This seems to apply only in cases where a profession does not have an existing accrediting body. Pharmacy has the Australian Pharmacy Council (APC)

**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.

**Support** Same comment as 3.6.1

**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.

**Support** Same comment as 3.6.1 and 2

**Proposal 3.6.4:** It is proposed that the legislation will give general delegation 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.

**Support**

**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.

**Support – but make same provision for individuals**

**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.

**Support – it is assumed that the national management agency would undertake administration in order to achieve consistency and economy of scale.**

**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.

**Support**

**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, and requirements for the accreditation body or committee to report any such adverse events to the relevant national board as soon as it becomes aware of them.

**Support**

**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 courses.

**Support**

**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.

**Support**

**Proposal 6.1:** It is proposed that 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 providers 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.

**Support**