

Response template for the proposed principles on strengthening the involvement of consumers in accreditation - public consultation

February 2024

This response template is the preferred way to submit your feedback to the public consultation on the draft proposed **principles to strengthen the involvement of consumers in accreditation**.

Please provide any feedback in this document, including your responses to the questions in the text boxes on the following pages. The boxes will expand to accommodate your response. You do not need to respond to a question if you have no comment.

Making a submission

Please complete this response template and email to AC_consultation@ahpra.gov.au using the subject line '*Feedback: Public consultation on principles to strengthen the involvement of consumers in accreditation*'. **Consultation closes on 18 April 2024.**

Publication of submissions

We publish submissions at our discretion. We generally publish submissions on our [website](#) to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know below if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. A request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let us know if you do not want us to publish your submission or if you want us to treat all or part of it as confidential.

Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.

Do you want your responses to be published?

- ☒ Yes – please publish my response with my name
- ☐ Yes – please publish my response but don't publish my name
- ☐ No – I do not want my responses to be published.

Stakeholder details

Please provide your details in the following table:

Name:	<input type="text"/>
Organisation name:	Australian Psychology Accreditation Council (APAC)

Your responses to the consultation questions

1. Does any content need to be added to or amended in the draft proposed principles?

My lived experience of person-centred care has highlighted the intrinsic relationship between high-quality care and robust inter-professional communications and practises. It has also confirmed the intense challenges and negative outcomes consumers endure when practitioners take a siloed approach to treating and managing complex medical needs.

To develop in graduates the mindset needed for person-centred care, most accreditation standards include inter-professional learning and practice. This necessarily makes one Ahpra-related accreditation council a consumer for all other Ahpra-related accreditation councils.

The draft principles and case study look to changing paradigms around cultural responsiveness through culturally safe engagement of First Nations' stakeholders that includes co-design, self-determination and Indigenous stewardship. Yet, no such interfaces are proposed to encourage inter-professional engagement across accreditation councils for assessment or continuous improvement purposes.

Formally recognising stakeholders related to inter-professional learning and practice – and more importantly, including appropriate strategies for accreditation councils to engage each other as consumers within a range of accreditation activities – would help to underscore and promote government policy in this space.

Specifically:

APAC has developed an engagement matrix to guide our engagement with stakeholders that includes four categories of consumer-stakeholders with associated activity. This could be formally introduced to inform better engaged practice by accreditation councils:

High interest/low impact-influence – engagement through forums, newsletter, podcasts

High interest / high impact-influence – project collaboration/co-design; regular meetings

Low interest/low impact-interest – newsletters, podcasts, website

High impact-influence / low interest – engagement through forums, and sector peak bodies around shared strategy

Principle 1, Principle 2

Program and project implementation with likely impact on consumers should include principles of inform, consult, involve, collaborate or empower based on likely impact. High interest/impacted consumers should be engaged in a collaboration/empowerment mode of engagement. Structures that can accommodate this are formal boards, advisory boards, development days/conferences and/or representation on project control groups.

Principle 5

The Standards themselves are important to ensure the voice of diverse groups in the work of providers. The extent to which these can be collaboratively further developed to ensure diverse interests are considered should be specified for consideration.

Membership on structures that can accommodate diversity are formal boards, advisory boards, development days/conferences and/or representation on project control groups.

2. Are there any implementation issues the Accreditation Committee should be aware of?

Accreditation councils first need to establish themselves as a culturally safe employer to ensure the success of documented stakeholder engagement strategies.

An engagement matrix to guide our engagement with stakeholders should be considered to include four categories of consumer-stakeholders with associated activity. This could be formally introduced to inform better engaged practice by accreditation councils:

High interest/low impact-influence – engagement through forums, newsletter, podcasts

High interest / high impact-influence – project collaboration/co-design; regular meetings

Low interest/low impact-interest – newsletters, podcasts, website

High impact-influence / low interest – engagement through forums, and sector peak bodies around shared strategy

3. Are there any potential, unintended consequences of the draft principles?

The logic expressed in the response to Question 1 applies equally here. Omitting a key stakeholder from the principles will limit the scope (i.e. depth and breadth) of their application.

4. Do you have any general comments or feedback about the draft proposed principles?

Thank you for generating a document in plain English that is fit-for-purpose. The purpose is transparent, the context is clearly defined, and strategies are well articulated.