

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 These submissions will not be published on the website or elsewhere.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:	
Organisation name:	Dietitians Australia

Your responses to the consultation questions

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

It is noted that principles of consumer involvement in professional/competency standards is missing from the proposed principles. This is part of accreditation but could be more clearly described within the principles – please see this paper for more details -

<https://www.frontiersin.org/articles/10.3389/fmed.2022.918915/full>

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

For Dietitians Australia, resourcing and capacity could be a limiting factor in implementation.

The structural components outlined are key in ensuring a wide and diverse range of views are captured.

While the timing of consumer involvement is mentioned, it will be important to consider how much consumer involvement may be required throughout the process and ensure that consumers are aware of this from the beginning. This will help to manage expectations and allow for continuous and meaningful involvement.

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

- Risk management - if negative feedback/comments are received how will this be managed? How will these be addressed if something needs to be actioned?
- Diversity is mentioned and should include a broad range of consumers to facilitate this. Is the list provided exhaustive? Is specifying these groups limiting opportunity?
- The principles refer to 'marginalised' groups – who does this refer to?
- What is considered appropriate payment? Consideration should be given to utilising appropriate guidelines for professional contributor fees.
- Confidentiality is not discussed in the proposed principles. It should be ensured that consumers involved are aware of all details relating to their involvement and appropriate consent is received.
- Consumer involvement should take accessibility into consideration. This could be including a range of formats for providing feedback (electronically, via speech etc.)

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

- Consider meaning of 'marginalised' groups and provide a definition or re-word if necessary.
- As mentioned above, resourcing and capacity may be a limiting factor so organisations will require guidance and support to ensure the principles are embedded in their accreditation processes.
- It is important to consider what is required of consumers to ensure there isn't an overuse of input, rather it is meaningful and appropriate.