

## 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](mailto: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 These submissions will not be published on the website or elsewhere.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:	Universities Australia

## Your responses to the consultation questions

<b>1. Does any content need to be added to or amended in the draft proposed principles?</b>
<p><b>Principle 2: Recruitment</b> The document categorises students as one of several groups of “directly involved consumers” (p3). We support students being recruited through education providers with accredited programs of study and suggest that this be more explicitly stated in the document.</p> <p><b>Principle 4: Support</b> As already outlined in the document, consumer needs may vary, and some consumers may require additional support to become involved. We propose the following amendment highlighted in blue to capture this.</p> <p style="padding-left: 40px;">Consumers should be given the training, resources and appropriate payment to the level of their involvement <i>and to support equitable participation.</i></p> <p><b>Principle 5: Diversity</b> Universities Australia supports specifying the steps needed to involve Aboriginal and Torres Strait Islander Peoples in consultation and suggest that engagement with all consumers, particularly those from hard-to-reach groups, includes the principles of co-design. We propose the following addition:</p> <p style="padding-left: 40px;"><i>The strategies accreditation authorities use to enable consumers to participate, particularly those from hard-to-reach groups, incorporate the principles of co-design.</i></p> <p><b>Principle 7: Feedback</b> The current wording of the second explanatory point could be read to imply that the consumer is being evaluated, rather than the consumer’s experience of the process. We propose the following amendment highlighted in blue.</p> <p style="padding-left: 40px;"><i>The process of</i> consumer involvement should also be evaluated...</p>
<b>2. Are there any implementation issues the Accreditation Committee should be aware of?</b>
None noted at this point.
<b>3. Are there any potential, unintended consequences of the draft principles?</b>
None noted at this point.
<b>4. Do you have any general comments or feedback about the draft proposed principles?</b>
<p>Universities Australia broadly supports the draft principles to strengthen consumer involvement in the accreditation process as outlined in the document.</p> <p>As noted above, consumer needs vary and consumers who routinely experience disadvantage may require additional support to secure their involvement. We support this approach and consider the principles overall provide a foundation both to strengthen, and enable a more equitable, involvement of consumers in the accreditation process.</p>