



Aboriginal and Torres Strait Islander
Health Practice Accreditation Committee
AHPRA
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RE: TAFE NSW Response to the consultation questions to the draft Accreditation Standards: Aboriginal and Torres Strait Islander health practice

TAFE NSW is pleased to provide feedback on the draft revised Aboriginal and Torres Strait Islander Health Practice Accreditation Standards. TAFE NSW recognises the challenges in revising the standards and the feedback is provided to assist in making improvements to the draft Accreditation Standards.

Overall the proposed revised accreditation standards, associated criteria, expected information and explanatory notes are reasonable, simple and mostly indicate what is required for education providers to demonstrate they are producing safe and competent graduates.

1. Does any content need to be added?

The statement for each standard is very brief and could be expanded to provide some more context to what it covers. The description for each Standard provided in the introduction to the explanatory notes would be well placed in a header under the Standard title.

The definition in the glossary of what constitutes an appropriately qualified workplace supervisor is unclear, and further clarification and expected information to be provided would be beneficial.

Standard 3, would be enhanced by the addition of an associated criteria or expected information relating to the need to successfully complete a minimum of 500 hours of workplace experience in a primary healthcare setting.

2. Does any content need to be amended?

The qualification/s that are to be included in the Accreditation Standards and the evidence requirements related the chosen qualification/s throughout is unclear. The Preamble makes reference only to the Certificate IV in Aboriginal and/or Torres Strait Islander Primary Health Care Practice qualification (HLT40213). However, reference is made repeatedly in the explanatory notes throughout the document both to the VET (ASQA/TCA/VQRA) and Higher Education (TEQSA) regulator. Criteria 2.1 and 3.1 refer to delivery of HLT40213 (Certificate IV) or HLT50213 (Diploma) Aboriginal and/or Torres Strait Islander Primary Health Care Practice and delivery of a qualification at AQF level 6 (Associate Degree) or above. Criteria 2.3 and 2.4 then only ask for evidence in relation to the Certificate IV qualification.

In the expected information, reference is made throughout to graded examples of work (Criteria 1.1, 1.2, 1.3, 3.12 and 5.1). Training Packages used in the VET sector do not specify whether or not Units of Competency should be graded. Grading is not routinely used in a competency-based training system. Therefore asking to be shown three de-identified examples of graded assessment (lowest mark, highest mark, and average mark) may be more suited to Higher Education. The type of examples that would be provided in a non-graded training system will need to be identified and discussed.

In relation to Criteria 1.3, further clarification is needed regarding what is deemed an appropriate level of English language skills for students in the program prior to undertaking work placements and practical training. There is no explanation provided of the expected information relating to this requirement.

The content included in the five Domains is comprehensive but at times repetitive relating to the material the education provider needs to provide. For example, Criteria 2.1 and 3.1 appear to be very similar. Evidence requirements in Criteria 1.1, 1.2, 1.3, 3.7, 3.12 and 5.1 are the same. For Standard 3, Criteria 3.4 and 3.11 require similar information.

Criteria 3.1, does not match the Standard statement and might be better suited to Standard 2. It relates to the scope of the providers registration which does not fit with program design, delivery and resourcing.

3. Are there any potential unintended consequences of the current wording?

As noted in the response to Question 2, the qualification/s that are to be included in the Accreditation Standards is unclear.

4. Do the proposed revised accreditation standards, associated criteria, expected information and explanatory notes indicate clearly what is required for education providers to demonstrate they are producing safe and competent graduates?

Some improvement/further explanation is required as noted in other responses.

5. Do you consider education providers will have difficulty in providing evidence (expected information) to meet any of the criteria?

In relation to the expected information for Criteria 1.4, if workplace supervisors are not directly employed by the education provider, it may be difficult to maintain a register of all workplace supervisors' qualifications, registrations status and supervision responsibilities.

In relation to Criteria 2.8, having to provide examples of implementation of safety audits of all staff and student work and learning environments may be difficult to meet in relation to the work (placement if this is the meaning) environment. Further clarification is required here.

6. Do you have any other general feedback or comments on the proposed revised standards?

Drafting accreditation standards that create the potential for education providers that deliver higher level qualifications at Diploma, associate degree or Bachelor level to apply for accreditation may prove problematic. Further feedback and advice is required to ensure that the accreditation standards will be suited to such a wide range of qualification levels.