



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 These submissions will not be published on the website or elsewhere.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:	Hayley Hawkins, Manager, Policy and Projects
Organisation name:	Australian Dental Council

Your responses to the consultation questions

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

The Australian Dental Council (ADC) does not have any content for addition but notes some minor suggested amendments below.

As noted in previous feedback, the deliberately broad definition of consumers in the Principles is supported in that it now includes groups that have typically been under-represented. However, when implementing the principles this could cause confusion for authorities to determine the type(s) of consumers to engage, at which time to best engage them, and how to optimally capture their perspectives and feedback. A suggested amendment (addition) to the examples of different scenarios in Table 1 could be to include the type(s) of recommended consumer engagement.

Principle 7 (Feedback) could be amended to also highlight the importance of capturing feedback from involved consumers (i.e. two-way feedback) to improve processes and experiences for engaging consumers in future work.

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

The ADC supports consumer participation in the design and delivery of health services and recognises this as essential for the provision of safe and quality person-centred healthcare. As the end-users of dental practitioner services, consumers have a significant stake in the competencies and attributes of practitioners who successfully complete the ADC assessment process. Community assessors from non-dental backgrounds evaluate programs at site visits, working as equal members alongside members of the dental professions to ensure a consistent focus on public safety in the ADC's decision making. Consumer members can provide value to the process by, for example, asking appropriate questions drawn from their particular background and experience; and by providing a voice in decision making from outside the relatively small domain of dental education and practice. Consumers also work alongside practitioner members on the ADC Board and its committees. Since implementing processes to seek consumer input across various functions of the ADC, the organisation has noted challenges in recruiting consumer assessors from diverse groups to ensure the voices of representatives from these population groups are heard, the process is fair and results in an appropriately diverse assessor group. It will also be important that processes are established to ensure the safety of consumers throughout their engagement with accreditation authorities. To help address these issues, the Health Professions Accreditation Collaborative Forum could establish consumer groups to be engaged as necessary by members of the Forum, which would provide additional benefits in facilitating the Forum's interprofessional collaborative practice goals.

The ADC also acknowledges that some accreditation authorities may be further advanced than others regarding procedures and policies for the engagement of consumers. Provision of examples of these types of documents could help to standardise processes across accreditation authorities, supporting consistent experiences for consumers. It will also be important that processes are established before consumers are engaged for any purpose to promote an optimal experience for individuals to contribute their perspectives.

Upon initial implementation of the Principles there may be a need for additional resource development by accreditation authorities, combined with provision of subsequent training to ensure accreditation authority staff are able to successfully execute the consumer recruitment and engagement process. Internal education regarding the role of consumers may be required for authorities that have not typically or regularly engaged consumers in their work. Additional consideration may be required for how best to engage consumers from rural and remote areas if existing mechanisms (e.g. teleconferencing) are not ideal for specific projects or resources are limited (e.g. remuneration for travel expenses).

It may also be necessary for accreditation authorities to be flexible in their approaches to working with consumers and vary these depending on the purpose of collaboration to ensure optimal engagement and participation. Establishing trust between authorities and consumers will require transparency in processes and clear visibility of how consumers' feedback is being used.

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

Principle 5 (Diversity) is admirable in its promotion of inclusion of individuals from many different consumer groups; however, it is unclear if the intention is to (ideally) involve representatives from all groups for each consumer engagement activity. If it is assumed this is not the intention (because of, for example, resourcing or time constraints) challenges could arise from being unable to accommodate representatives from all population groups. This may lead to under-representation of some groups or unintended bias in assessments if only some consumer groups are represented. When establishing assessor teams, the ADC strives to select individuals so there will be a balance of thoughts and diversity in decision-making by the team (e.g. assessors with different skills, of varying ages, of different genders). Consideration would need to be given to how representatives from each group would be prioritised, for example, based on rotation or simply on availability? An additional concern would be if no consumers are available to advise from a cultural perspective.

As above, perhaps examples of different scenarios and the type of recommended consumer engagement could be helpful to ensure all voices are heard.

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

As noted in previous consultation feedback, the ADC seeks to understand the degree to which these principles will be monitored to assess their uptake and review effectiveness across accreditation authorities. While the principles outline evidence-based best practice recommendations, the ADC notes that a clear distinction is required to distinguish recommendations from policy. It would also be preferable to understand how the Committee will decide what type of advice to provide, and when this would occur.