



Aboriginal and Torres Strait  
Islander Health Practice  
Chinese Medicine  
Chiropractic  
Dental  
Medical  
Medical Radiation Practice  
Nursing and Midwifery  
Occupational Therapy  
Optometry  
Osteopathy  
Pharmacy  
Physiotherapy  
Podiatry  
Psychology

Australian Health Practitioner Regulation Agency

## Response template for providing feedback to public consultation – draft proposed professional capabilities for Aboriginal and Torres Strait Islander health practice

This response template is an optional way to provide your response to the public consultation paper for the **Draft proposed professional capabilities for Aboriginal and Torres Strait Islander health practice**. Please provide your responses to any of the questions in the corresponding text boxes; you do not need to answer every question if you have no comment.

### Making a submission

Please complete this response template and send to [accreditationstandards.review@ahpra.gov.au](mailto:accreditationstandards.review@ahpra.gov.au), using the subject line *'Feedback on draft proposed professional capabilities for Aboriginal and Torres Strait Islander health practice.'*

**Submissions are due by COB on Monday 9 September 2019.**

### Stakeholder details

Please provide your details in the following table:

<b>Name:</b>	Jess Styles
<b>Organisation Name:</b>	NACCHO

## About the National Aboriginal Community Controlled Health Organisation (NACCHO)

This submission is prepared on behalf of the Aboriginal Community Controlled Health Sector. NACCHO is the national peak body representing over 145 Aboriginal Community Controlled Health Organisations (ACCHOs) across the country on Aboriginal and Torres Strait Islander health and wellbeing issues. NACCHO's work is focussed on liaising with governments, its membership, and other organisations on health and wellbeing policy and planning issues and advocacy relating to health service delivery (including disability), health information, research, public health, health financing and health programs. Sector Support Organisations, or Affiliates, are State/Territory based and also represent ACCHOs offering a wide range of support services and health programs to their members including advocacy, governance and the delivery of State, Territory and national primary health care policies. ACCHOs contribute to improving Aboriginal and Torres Strait Islander health and wellbeing through the provision of comprehensive holistic primary health care, by integrating and coordinating care and services, and by advising and supporting other providers to deliver better quality healthcare for Aboriginal and Torres Strait Islander peoples. In addition, ACCHOs play a significant role in improving Aboriginal and Torres Strait Islander health by addressing the social determinants of health and through the practical expression of self-determination and community control.

## Your responses to the public consultation questions

<b>1. Does any content need to be added to the draft professional capabilities?</b>
<b>Domain 3: Communication and Collaborator</b>  A key capability around community engagement should be included. Aboriginal and Torres Strait Islander Practitioners need to be able to build ongoing, permanent positive relationships with the community and organisations to ensure the community is fully engaged in the activities of the clinic (or location where the Aboriginal and Torres Strait Islander Practitioner is working).  <b>Domain 5: Quality and Risk Manager</b>  A key capability around emergency planning and health emergency responses should be included. This is particularly critical for Aboriginal and Torres Strait Islander Practitioners working in remote areas who need to have an understanding of emergency planning for disasters as well as basic trauma management in medical emergencies.
<b>2. Does any content need to be amended or removed from the draft professional capabilities?</b>
Need to ensure the draft capabilities in the Professional Capabilities align with the current competencies under each Aboriginal and Torres Strait Islander Health Worker/Practitioner qualification.
<b>3. Is the language clear and appropriate? Are there any potential unintended consequences of the current wording?</b>
NACCHO would caution the use of terms “cultural safety” and “cultural competency”. It is NACCHO’s position that cultural safety is something central to the experience of the patient/client and should not be spoken of as a principle to be applied as in Domain 2, Key capability 2.b.  The draft Professional Capabilities should frame cultural safety/competency as something achieved through understanding and acceptance by the local Aboriginal and Torres Strait Islander community and people. (Noting that there is a separate consultation on defining cultural safety through AHPRA concurrent to this process).  Other than the above, the language is clear and appropriate and explains definitions of words, so readers clearly understand the intent of the individual capabilities.
<b>4. Are there jurisdiction-specific impacts for practitioners, or governments or other stakeholders that the Accreditation Committee should be aware of, if these professional capabilities are adopted?</b>
Some of NACCHO’s Affiliates administer the HLT40213 qualification, so they should be consulted to ensure no unintended consequences for them or students undertaking the qualification in the implementation of the Professional Capabilities.

**5. Are there implementation issues the Accreditation Committee should be aware of?**

Ensure minimal work to change curricula to meet the Professional Capabilities for RTOs, including NACCHO's Affiliate organisations. To ensure this, NACCHO encourages AHPRA and the Accreditation Committee to engage with Affiliate RTOs in smoothly transitioning to new curricula.

**6. Do you have any other feedback or comments on the draft revised professional capabilities?**