

Aboriginal Health College feedback on the draft revised Aboriginal and Torres Strait Islander Health Practice standards – AHPRA September 2018.

Consultation Questions:

1. Does any content need to be added?
2. Does any content need to be amended?
3. Are there any potential unintended consequences of the current wording?
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?
5. Do you consider education providers will have difficulty in providing evidence (expected information) to meet any of the criteria?
6. Do you have any other general feedback or comments on the proposed revised standards?

STANDARD 1: Assuring Safe Practice

Does any content need to be added?

An additional standard to reinforce that students undertaking clinical placements that the registered practitioners and/or other health professionals ensure that students in the program during work placements and practical training only undertake the training necessary to the unit of competency that they are undertaking placement for.

Does any content need to be amended?

Will standard 1 include that mandatory Cultural training be undertaken by practitioners for example NSW Health Department have the “**Aboriginal Cultural Training Framework: Respecting the Difference**” which was developed to assist increasing cultural competencies and promote greater understanding of the processes and protocols for delivering health services to Aboriginal people, this training is compulsory for all NSW Department of Health employees.

Are there any potential unintended consequences of the current wording?

There are no unintended consequences of the current wording under standard 1.

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?

The proposed revised accreditation standards indicate clearly what is required for education providers to demonstrate competent graduates.

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

Potentially, yes education providers may find it difficult to provide the evidence outlined in **Standard 1** and this is largely due to the trainers that a registered training organisation employees. A benefit too many RTO's, would be a database held by AHPRA which has registered trainers within their field of expertise who are highly skilled and have had no formal complaints issued to them by ASQA or AHPRA.

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

The preliminary consultation dated May 2018, on the draft registration standards for Aboriginal and Torres Strait Islander Health Practice Board of Australia which works in partnership with AHPRA to implement the National Registration and Accreditation Scheme has a determination been made on the suggested changes?

And will the organisations that did provide feedback to the consultation paper be notified?

Standard 2: Academic governance and quality assurance of the program:

Does any content need to be added?

No additional content is required.

Does any content need to be amended?

In addition to standard 2.10 in which an education provider is to provide staff matrix for the program which identifies staff Aboriginality and examples of targeted recruitment of Aboriginal and Torres Strait Islander people.

Additional content should include a staff matrix on all employees working within the education system which will provide the level of competency that person holds and their understanding of the processes and protocols for delivering cultural appropriate training to and for Aboriginal and Torres Strait Islander people.

Are there any potential unintended consequences of the current wording?

There are no potential unintended consequences of the current wording under standard 2.

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?

The explanatory notes under standard 2 clearly identify what is required from the education providers.

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

If the educator provider has good governance they will not have difficulty in providing evidence under standard 2.

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

Standard 2.10 the education provider ensures the recruitment, appointment and promotion of Aboriginal and/or Torres Strait Islander staff to contribute to student learning in the program, this requirement is problematic as the skilled Aboriginal and Torres Strait Islander peoples who work within the training industry are highly in demand which basically allows for uncapped salaries and smaller Aboriginal RTO's are unable to compete with training industries like TAFE.

Standard 3: Program design, delivery and resourcing:

Does any content need to be added?

Content will need to be added to reflect the proposed changes undertaken within the preliminary consultation on the draft registration standards for Aboriginal and Torres Strait Islander Health Practice Board of Australia if endorsed.

Does any content need to be amended?

Will the Aboriginal and Torres Strait Islander health strategy with the vision of: **'Patient safety for Aboriginal and Torres Strait Islander Peoples in Australia's health system is the norm'**, as defined by Aboriginal and Torres Strait Islander Peoples be incorporated into the standards once finalised.?

Are there any potential unintended consequences of the current wording?

There are no unintended consequences of the current wording within standard 3.

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?

The current proposed accreditation standards indicate clearly what is required for education providers to demonstrate they are producing safe and competent graduates but this may need to be reviewed if the proposed changes to the registration standards for Aboriginal and Torres Strait Islander Health Practitioners.

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

Education providers will have no difficulty in providing evidence to meet any of the criteria under standard 3 as long as Cultural Competence and Cultural Safety are incorporated into the accreditation standards.

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

N/A

Standard 4: The student experience:

Does any content need to be added?

There is no additional content to be added to standard 4.

Does any content need to be amended?

As stated above content, will need to be amended to reflect the proposed changes to the registration standards for Aboriginal and Torres Strait Islander Health Practitioners.

Are there any potential unintended consequences of the current wording?

There are no potential unintended consequences of the current wording within standard 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?

Standard 4 proposed accreditation standards clearly indicate what is required for the education provider to demonstrate they are producing safe and competent graduates.

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

If good Governance is in place than the education provider will not have difficulty in providing evidence in Standard 4.

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

N/A.

Standard 5: Assessment:

Does any content need to be added?

Under standard 5.4 staff that assess students in the program are suitably qualified, experienced, and prepared for the role. To be able to assist education providers a register of trainers who have received formal complaints from ASQA and AHPRA on their teaching standards should be made available to RTO's, currently there is no official site that education providers can source on disqualified trainers or issues that have arisen with that trainer within the industry.

Does any content need to be amended?

A staff matrix template for staff responsible for assessment of students should be mandatory not optional.

Are there any potential unintended consequences of the current wording?

There are no potential unintended consequences of the current wording within standard 5.

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?

Standard 5 proposed accreditation standards clearly indicate what is required for the education provider to demonstrate they are producing safe and competent graduates.

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

If there are any **pre-requisites** to training that could block student outcomes, such as working with children check, police clearance, drugs and alcohol.

It should be clearly defined that there should be more than two methods of assessment and practical experience before issuing any certificates.

If you have a pass mark set at 80% or whatever, this needs to be advised prior and student acceptance. If there is an AHPRA registration the T&C's around the registration need to be explained.

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

The preliminary consultation on the draft Aboriginal and Torres Strait Islander registration standards recommended many changes, how will AHPRA implement these changes within the current accreditation standards? And for example:

- It is recommended that COAG monitor a Health Practitioner has appropriate PII arrangements. Under section 130 (3) (ii) a register health practitioner is required to notify the Aboriginal and Torres Islander Health Practice Board of Australia within seven (7) days if appropriate PII arrangements are no longer in place, if COAG is to be the preferred legislative body and only meet a maximum two times per year how will the requirement be monitored.