



15 October 2018

Aboriginal and Torres Strait Islander Health Practice,
Chinese Medicine and Medical Radiation Practice
Accreditation Committees

By email: accreditationstandards.review@ahpra.gov.au

Dear Accreditation Committees

I refer to the public consultation on the joint review of current accreditation standards being undertaken by the Aboriginal and Torres Strait Islander Health Practice Accreditation Committee, Chinese Medicine Accreditation Committee and Medical Radiation Practice Accreditation Committee (Accreditation Committees).

The National Health Practitioner Ombudsman and Privacy Commissioner (NHPOPC) **supports** the proposed revisions in the draft accreditation standards for these professions. It is important that accreditation standards are regularly reviewed to ensure that they are contemporary and relevant. It is our view that the revised standards more clearly and comprehensively outline the criteria that education providers will be assessed against when applying for accreditation under the Health Practitioner Regulation National Law (National Law). Further, aligning these standards across the three professions promotes a consistent approach for education providers.

Role of the NHPOPC

The role of the NHPOPC is to provide ombudsman, privacy and freedom of information oversight of the Australian Health Practitioner Regulation Agency (AHPRA) and the 15 National Boards, including the Aboriginal and Torres Strait Islander Health Practice Board of Australia, the Chinese Medicine Board of Australia and the Medical Radiation Practice Board of Australia.

We handle complaints and, where appropriate, conduct investigations into the administrative processes of AHPRA and the National Boards in order to assist people (both members of the public and health practitioners) who are dissatisfied with the way a matter has been handled. We also work with AHPRA and the National Boards to address systemic issues which have been identified during the course of our complaint handling activities.

Overview of NHPOPC complaints data

The NHPOPC recorded 794 approaches during the 2017–18 financial year. This was the NHPOPC's busiest year to date, with 24% more approaches in comparison with 2016–17. After assessment, 444 of the approaches were recorded as complaints about AHPRA and/or one of the National Boards.

The overwhelming majority of complaints received by the NHPOPC (65 per cent in 2017–18) concerned the administrative processes of AHPRA and the National Boards in relation to handling notifications about the health, conduct or performance of health practitioners. The second largest category was complaints about registration, which represented 28 per cent of all complaints in 2017–18.

It is noted, however, that we did not record any complaints that were specifically about the current accreditation standards relating to the Aboriginal and Torres Strait Islander Health Practice Board, Chinese Medicine Board or Medical Radiation Practice Board. Based on this, it would appear that the current accreditation standards are not a major area of concern for people who approach the NHPOPC.

A further breakdown of complaints received by the NHPOPC in 2017–18 is included below:

Aboriginal and Torres Strait Islander Health Practice Board

To date, the NHPOPC has not received any complaints about AHPRA and the Aboriginal and Torres Strait Islander Health Practice Board.

Medical Radiation Practice Board

In 2017–18, only three of the 444 complaints received by the NHPOPC were about AHPRA and Medical Radiation Practice Board. This is consistent with the number of complaints received about the Medical Radiation Practice Board in 2016–17.

A review of the complaints received about the Medical Radiation Practice Board from 2016–17 to 2017–18 shows that:

- five complaints concerned registration issues
- one complaint was made by a notifier about the handling of a notification.

Common themes in the registration complaints included delay in finalising matters and incorrect information being provided to applicants.

Three of the six complaints proceeded to an investigation by the NHPOPC. Of these three complaints:

- two were finalised when the NHPOPC provided formal comments/suggestions for improvement to AHPRA about the handling of the matters
- one complaint was resolved when our office provided the complainant with a further and better explanation about the issue that led to their complaint.

Chinese Medicine Board

In 2017–18, only one of the 444 complaints received by the NHPOPC was about the Chinese Medicine Board, which is similar to 2016–17, when only two complaints were received.

The complaint made in 2017–18 was from a notifier about the handling of a notification and was closed when we received no further contact from the complainant. In 2016–17, both complaints were made by practitioners in relation to registration issues. These complainants were referred back to AHPRA in order to provide AHPRA and the Chinese Medicine Board with an opportunity to resolve the concerns.

Draft revised accreditation standards

Notwithstanding our limited complaint data in relation to accreditation standards, the NHPOPC supports the proposed revisions to the accreditation standards. This is because the revisions more explicitly set out the standards that educational providers will be assessed against when applying for accreditation.

In relation to all three sets of revised standards, the NHPOPC:

- has no suggested amendments to the content
- does not foresee any potential unintended consequences of the current wording
- agrees that 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
- considers that the revisions are clearer than the previous standards on the evidence required to meet the criteria.

It is clear from the consultation documentation that the Accreditation Committees have put significant work into the joint review of the current accreditation standards and the proposed revisions. The NHPOPC has no further comments but applauds the efforts of the Accreditation Committees to improve the accreditation standards.

Thank you for the opportunity to comment on the draft revised accreditation standards.

You are welcome to contact this office on 1300 795 265 or by email via complaints@nhpopc.gov.au if you require any further information.

Yours sincerely

A solid black rectangular box used to redact the signature of Richelle McCausland.

Richelle McCausland

National Health Practitioner Ombudsman and Privacy Commissioner