

Ahpra Protocol

Complete audit

This protocol applies to restrictions imposed or accepted from **16 September 2024**

Australian Health Practitioner Regulation Agency
National Boards

GPO Box 9958 Melbourne VIC 3001 [Ahpra.gov.au](https://www.ahpra.gov.au) 1300 419 495

Ahpra and the National Boards regulate these registered health professions: Aboriginal and Torres Strait Islander health practice, Chinese medicine, chiropractic, dental, medical, medical radiation practice, midwifery, nursing, occupational therapy, optometry, osteopathy, paramedicine, pharmacy, physiotherapy, podiatry and psychology.

Ahpra Protocol: Complete audit

Overview

This Ahpra Protocol - *Complete Audit* (the Protocol) sets out the requirements that apply to practitioners with a registration restriction for audit. We monitor compliance with this restriction to protect patient safety.

You will receive a monitoring plan that details contact information, due dates, and the information you will need to provide to show that you are complying with your restrictions. The plan will be updated as you complete the requirements. Read your monitoring plan in conjunction with the Protocol/s.

The Ahpra website and [Register of practitioners](https://www.ahpra.gov.au) is located at <https://www.ahpra.gov.au>. Monitoring and compliance information is available under the Registration section. The online Protocols and forms are available from the [National Restrictions Library 2.0](#) section of the monitoring and compliance web page.



In this Protocol:

'Restriction' and 'Restrictions' refers to:

- conditions and undertakings on your registration that are related to the requirements of this specific Protocol

'We' 'us' and 'our' refers to:

- the Australian Health Practitioner Regulation Agency (Ahpra),
- the Board for the health profession you're registered for.

The Protocol includes:

- individually numbered paragraphs and sub-paragraphs to help you navigate the requirements.
- highlighted requirements that you must follow using this symbol: ▲
- clarifying information and advice from us to help you follow the requirements, using this symbol: ⓘ
- terms that we define in specific ways. The first time we use one of these terms, we've hyperlinked these to their definitions for your reference

The Protocol's requirements fall into five main areas.



Requirements

1. Acknowledge the requirements

1.1 Practitioner Acknowledgement

- 1.1.1 You must acknowledge the requirements of the restriction on your registration, and the *Ahpra Protocol: Complete audit* (the Protocol) within 30 calendar days of the restriction start date.
- 1.1.2 Complete the [Form \[HPA.2.10\]](#): Complete audit - Practitioner Acknowledgement Form

2. Nominate an auditor

2.1 Nomination requirements

- 2.1.1 You must provide the following information within 30 calendar days of the start date of the restrictions:
- 2.1.2 You must complete the [Form \[HPN.2.10\]](#): Complete audit – Nomination of Auditor Form and include a copy of the nominated auditor's curriculum vitae (CV).
- 2.1.3 The nominee must complete the [Form \[NMA.2.10\]](#): Complete audit – Auditor Acknowledgement Form.
- 2.1.4 You may also choose to submit the audit plan with your nomination.

2.2 Requirements for auditors

- 2.2.1 Your nominated auditor must hold registration as a health practitioner and their CV must demonstrate they have the skills, training, experience and/or qualifications necessary to conduct the audit(s) in the required areas of focus.
- 2.2.2 Both you and your nominee must declare any actual, potential, or perceived conflicts of interest. If requested by Ahpra, you must provide information on how you will manage the conflict.



An auditor must be able to give an independent report of the audit findings and be willing to provide reports to us if they identify concerns with your conduct, performance, or compliance with your restrictions.

A conflict of interest may arise from being in a collegiate, family, social or financial relationship which could be compromise the nominee's judgment, decisions, or actions in performing their nominated role.

We will consider your nominee's regulatory history to determine whether they are appropriate to provide the audits on the required topic(s).

Nominations that don't meet the above requirements may be considered in extenuating circumstances. Nominations not meeting the above requirements usually require longer timeframes for consideration.

We may refuse your nomination.

2.3 Information to be provided to nominated auditor

- 2.3.1 You must provide your nominated auditor with a copy of the audit restrictions, the Protocol, and the contact details of your Ahpra case officer or team.



It is expected that you will share the reasons for the audit requirements including the areas of concern identified when restrictions were imposed. This will ensure that your auditor has a full understanding of the areas of concern to be assessed by the audit.

We may provide your nominated auditor with details of the reasons for the restriction imposed requiring you to undertake the audit.

For more information refer to the [Appendix – Information for auditors](#) in this Protocol

2.4 Audit plan

① You may submit your audit plan with your nomination of an auditor or after we have considered and approved the auditor.

2.4.1 You must provide a written audit plan within 30 calendar days of the date of approval of the auditor.

2.4.2 The audit plan must be written by the approved auditor.

2.4.3 The audit plan must outline how the areas of concern identified in the reasons will be assessed and must include the following information:

- The date of the audit(s)
- The format of the audit(s)
- When relevant, how patients or records will be selected for audit
- When relevant, the number of patients or records for audit either as a
 - number, or,
 - percentage of total patient load,
- The assessment criteria to be used.

3. Assessment of audit nomination

① We will consider the suitability of your nominated auditor and your audit plan, and whether it adequately addresses the concerns identified.

Only audits undertaken by an approved auditor and in accordance with an approved audit plan can be used to satisfy the requirements of your restrictions. You will be advised if your nomination is approved.

Incomplete nominations will not be considered for approval. Where you provide an incomplete nomination, or repeatedly fail to make a nomination that adequately addresses the identified concerns, we may consider whether this is non-compliance and/or whether further regulatory action is required.

We may refuse your nomination of an auditor and/or request changes to the audit plan.

4. Complete audit

4.1 Requirements of completing audit.

4.1.1 You must complete the required audit(s) within the timeframe for completion provided in your restrictions.

4.1.2 When requested you must provide to the auditor the following:

- Access to any practice locations at which you practice
- patient lists, appointment or billing data
- patient records including prescribing and clinical records
- electronic record keeping systems

5. Submit evidence

5.1 Evidence of completion

5.1.1 You must submit an audit report written by your approved auditor within 30 calendar days of the completion of each required audit.

- ① The auditors report will be used to confirm your compliance with the restriction.
We may contact your auditor in relation to the report(s) to clarify any information required.
For more information refer to the [Appendix – Information for auditors](#) in this Protocol.

5.2 Auditor's report

- 5.2.1 You must provide a report from the auditor which includes:
- the date(s) the audit(s) occurred, and,
 - confirmation that the audit was conducted consistent with the approved audit plan, and,
- 5.2.2 the auditor's comments on:
- your performance and/or conduct relating to the focus of the audit
 - your compliance with the requirements of your restrictions
 - any area's identified for further improvement, education, or training, and,
- 5.2.3 Improvements you intend to or have implemented related to the concerns that led to the restriction such as policies, procedures, templates, or ongoing audits.
- 5.2.4 If the report makes adverse findings, you must, if requested by us, provide information on how you have responded to the audit findings, including any evidence of changes to your practice.

6. Withdrawal of approved auditor

6.1 Notify us and submit new nomination

- 6.1.1 In the event your approved auditor is no longer willing or able to provide the audit(s) required, you must notify your Ahpra case officer or team as soon as possible and provide a new nomination for an auditor within 30 calendar days. The nomination must meet the same terms as outlined in section 2.
- 6.1.2 On approval of a new auditor, within 30 calendar days, you must either provide:
- An audit plan written by the new nominated auditor in the same terms as 2.4
 - Endorsement from the new nominated auditor that the previously approved audit plan remains appropriate (with details of any amendments required).

- ① The new nomination must include an audit plan.
This can be a newly developed plan, or the new nominated auditor may amend or endorse the existing plan if they agree that it is appropriate.
The plan will require approval before commencement.

7. Extensions of time



An extension of time may be permitted on a case-by-case basis for you to:

- nominate an auditor
- provide a copy of your audit plan,
- complete your audit,
- provide your audit report

Extensions may be considered in the following circumstances:

- A third party requires additional time to provide the required information, or
- In extenuating circumstances such as significant ill health, or other events outside of your direct control.

Evidence of the basis of the request may include evidence of engagement with third parties such as education consultancies, professional associations, or registered health practitioners, medical certificates or other documentation evidencing steps taken to comply with your restrictions.

7.1 Requesting an extension

7.1.1 If you require an extension of time, you must provide a written request prior to the due date detailed in your monitoring plan.

7.1.2 When requesting an extension, you must provide a proposed timeframe for completion of the requirement.

7.1.3 You must indicate the reason for your request and may be required to provide evidence of the basis of the extension.

7.1.4 **If you are granted an extension, you must complete the relevant action or requirements within the extended timeframe.**



7.2 Change of circumstances

7.2.1 You must contact your Ahpra case officer or team as soon as possible if you have had a change in your circumstances or are unable to comply with the requirements for any reason. See your monitoring plan for contact information.

9. Costs

9.1 Responsibility for costs

9.1.1 You are responsible for all costs associated with complying with this restriction and Protocol.

9. Privacy

9.1 Collection of personal information



We are committed to protecting your personal information.

The ways in which we may collect, use and disclose your information are set out in our [Privacy Policy](#).

The privacy policy and further information regarding [Ahpra's Privacy, Freedom of Information and Information publication scheme](#) is available on Ahpra's website.

Appendix A: Information for auditors - Complete audit

1. Introduction

This information sheet is to help you, as an approved auditor, better understand your role and responsibilities when auditing the practice of a practitioner (or student) with restrictions.

Restrictions (conditions and undertakings) are placed on a practitioner's registration when they consider it necessary to protect the public.

Agreeing to audit the practice of another health practitioner with a restriction is an important responsibility. We have delegated responsibility to you, to ensure the person you are auditing is practising to the expected standard.

Your service to the community and support of your colleague, by undertaking the audit(s), is appreciated and we thank you for taking this important role.

2. When should I decline to act as an auditor?

An auditor must be able to provide an independent report of the audit of practice and must be willing to report to us immediately if any practice of the practitioner is placing the public at risk.

Any actual or perceived conflicts of interest that may undermine the independence of your reporting must be declared prior to the commencement of the audit arrangement, and at any point any such situation develops during the audit arrangement.

i An actual or perceived conflict of interest occurs when a fair-minded observer might reasonably believe that the outcome of the education arrangement may be influenced by a close collegiate, family, social or financial relationship or any other relevant circumstances between educator and practitioner.

Examples of situations that may result in a conflict of interest are:

- The practitioner being the employer of the auditor and having the ability to direct the audit of practice.
- Having a shared financial or other interest with the practitioner being audited or if your friends or relatives have such an interest.
- Accepting a gift or benefit that may be intended to or be seen as intending to influence how you act as an auditor.
- Having a personal, philosophical, religious, moral or political belief or attitude that could be seen to affect your impartiality.
- Having or developing a personal relationship with the practitioner being audited or their friend or relative that goes beyond the level of a professional working relationship.
- Providing reports to us that result in your personal gain or advantage.

3. What is an auditor expected to do?

In undertaking the audit, we expect that you will:

- develop a written audit plan for our approval outlining the form the audit(s) will take and how the area of concerns identified when the restriction was imposed will be addressed in the audit,
- undertake the audit as per the approved plan,
- immediately inform us of any significant concerns identified through the audit where any of the practitioner's practice or conduct is placing the public at risk
- provide a written report of the audit(s) to us, and
- notify us as soon as possible if you intend to withdraw from the role of auditor.

4. Developing an audit plan

An effective audit plan provides a scope for the audit that allows you to assess the practitioner's performance or conduct in the areas of the concerns identified and must include activities specifically targeted at assessing those areas of concern.

- A schedule of the planned audit (s) which complies with any specific requirements stated in the conditions, pertaining to:
 - the number of audits and
 - the minimum requirements for the audit
 - The type and description of activities that will be undertaken and how the practitioner's performance and conduct will be assessed, including details of any benchmark or reference standards to which you will refer to.

Types of activities may include, but are not limited to:

- discussions
- practice and/or demonstration of activities/tasks
- observing the practitioner in their practise
- review of case notes /reports

The planned activities must directly relate to, and assess, the concerns that led to the imposition of the audit restriction. The concerns are identified within the restrictions published to the national register and in the reasons for imposition.



- Details on the logistics of the audit(s), for example whether in-person, via online video chat or a combination of both, whether at the practitioner's place of work or another location.
- Information about evaluation and assessment methods that will be used to evidence the practitioner's competence, and the minimum expected outcome that will demonstrate attainment of the required standard of skill and knowledge.
- The practitioner's signature committing to the plan.



Present the details of the audit plan in a format/layout that is easy to read and reference.

5. What information is to be included in an audit report?

The information which is to be included in an audit report should be enough for us to determine whether the issues which gave rise to the imposition of the restriction requiring the audit have been addressed. The reports are to be forwarded to us (addressed to the compliance case officer, whose name and contact details will be provided to you).

An example of what should be included in a report is as follows:

- date and duration of the audit
- confirmation that all audit activities detailed in the approved audit plan have been completed
- whether the practitioner's practice has or has not been satisfactory and additional information in support of this assessment
- whether there were areas for improvement noted and the feedback provided to the practitioner, and
- any recommendations for our consideration, for example, changes required in how the practitioner practises the profession, education or upskilling.

6. How will audit reports be used?

The audit report(s) will be used to determine whether the practitioner is practising to the expected standard.

The report will not routinely be released to the practitioner, However, if we rely on the report to take any further regulatory action against the practitioner, the report will be released. We may also have to disclose the report if this is required by law.



Collection of personal information:

We are committed to protecting your personal information. The ways in which we may collect, use and disclose your information are set out in our [Privacy Policy](#).

The privacy policy and further information regarding [Ahpra's Privacy, Freedom of Information and Information publication scheme](#) is available on Ahpra's website.

7. Rights and obligations as an auditor

As an auditor you are performing an important function for the purposes of the National Law, and this brings with it responsibilities and protections. In agreeing to undertake the audit, you are confirming that you are aware of the following rights and obligations, and that you must notify Ahpra and withdraw from the audit if you cannot meet these obligations. You may also, for any other personal reason, withdraw from the audit at any time by notifying Ahpra.

General duties

You must undertake the audit:

- in good faith
- in a financially responsible manner, and
- with a reasonable degree of care, diligence and skill.
- You must not use your position as auditor or the information that comes to you through this position to gain an advantage for yourself or someone else or to cause damage to the operation of the National Registration and Accreditation Scheme.

Duty of confidentiality

Protected information is information that comes to your knowledge through your role as an auditor. You must not disclose protected information unless:

- it is necessary to carry out the audit
- is required by law, or
- the person the information relates to consents to the disclosure.

All information provided to you, as an auditor, must be:

- securely stored to ensure confidentiality is maintained
- securely returned to Ahpra when asked, or
- destroyed when it is no longer needed to carry out the audit unless you are legally required to keep it (such as record keeping obligations).

Protection from personal liability

Ahpra provides protection from personal monetary liability for anything done or omitted to be done in good faith in conducting the audit.

Mandatory reporting

As a registered health practitioner, you have a mandatory reporting responsibility under the National Law. If in the course of practising your profession, you form a reasonable belief that another registered health practitioner has behaved in a way that constitutes 'notifiable conduct' you must notify Ahpra.

Notifiable conduct by registered health practitioners is defined as:

- practising while intoxicated by alcohol or drugs
- sexual misconduct in the practice of the profession
- placing the public at risk of substantial harm because of an impairment (health issue), or
- placing the public at risk because of a significant departure from accepted professional standards.



Further information on what constitutes 'notifiable conduct' and about how to make a mandatory notification can be found on the [Making a mandatory notification](#) page on Ahpra's website.

8. Costs

All costs associated with the audit and the provision of reports is the responsibility of the practitioner.

9. Submitting a complaint about Ahpra

We are committed to service excellence. Our [service charter](#) sets the standard of service you can expect when interacting with us. Our commitment to you is to be fair and respectful, transparent, responsive, empathetic and accountable. In return, [what we ask of you](#) when engaging with us is to please be courteous, clear, give us time to respond and be understanding if our response is limited by our legal obligations.

If you have a concern about our service delivery or administrative actions you can find out more about how we manage complaints at <https://www.ahpra.gov.au/About-AHPRA/Complaints.aspx>.