5. Your submission

Name of person or organisation making the submission:

Contact person:

Telephone:

Email:

Information about you

Are you responding as a/an (please tick all that apply)

Education provider

Peak professional organisation

Health consumer

Community member

Employer

Government (eg Health Department)

Government agency

Health Workforce Australia

TEQSA

ASQA/State based VET sector regulatory authority

Individual practitioner

Other

-please specify

What experience have you had with the accreditation council? (please tick all that apply)

Education Providers -

ANZPAC has undertaken an accreditation assessment of one or more of our education programs since the introduction of the National Scheme

ANZPAC undertook an accreditation assessment of one or more of our education programs before the introduction of the National Scheme

We are currently planning for, or undergoing, an accreditation assessment on one or more of our education programs

We are new to the accreditation process

We have been through an accreditation process previously with a different accreditation body

Stage of accreditation assessment (if you are currently involved in an accreditation process)

Nearing completion

Half way

Just commenced

Intention to apply submitted

Planning and preparation underway

Have sought information or advice from ANZPAC

Overseas qualified practitioner:

Assessment completed

Assessment nearing completion

Assessment just commencing

Have sought information or advice from ANZPAC

Other stakeholders

Have sought information or advice from ANZPAC on other matters

ANZPAC has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments

Involved in ANZPAC activities eg accreditation or assessment processes

Little or no direct engagement with ANZPAC

Other – please specify

Review of Accreditation Council against the Quality Framework for the Accreditation Function

5.1 Governance (Domain 1):

The Accreditation Council effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role

Attributes

- The Accreditation Council is a legally constituted body and registered as a business entity.
- The Accreditation Council's governance and management structures give priority to its accreditation function relative to other activities (or relative to its importance).
- The Accreditation Council is able to demonstrate business stability, including financial viability.
- The Accreditation Council's accounts meet relevant Australian accounting and financial reporting standards.
- There is a transparent process for selection of the governing body.
- The Accreditation Council's governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s.
- The Accreditation Council's governance arrangements comply with the National Law and other applicable legislative requirements.

Governance – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about governance is primarily at pages 6-7 of the report from ANZPAC published on the Board's website at www.podiatryboard.gov.au.

5.2 Independence (Domain 2):

The Accreditation Council carries out its accreditation operations independently

Attributes

- Decision making processes are independent and there is no evidence that any area of the community, including government, higher education institutions, business, industry and professional associations - has undue influence.
- There are clear procedures for identifying and managing conflicts of interest.

Independence – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about independence is primarily at page 8 of the report from ANZPAC published on the Board's website at www.podiatryboard.gov.au.

5.3 Operational Management (Domain 3):

The Accreditation Council effectively manages its resources to carry out its accreditation function

Attributes

- The Accreditation Council manages the human and financial resources to achieve objectives in relation to its accreditation function.
- There are effective systems for monitoring and improving the authority's accreditation processes, and identification and management of risk.
- The authority can operate efficiently and effectively nationally.
- There are robust systems for managing information and contemporaneous records, including ensuring confidentiality.
- In setting its fee structures, the Accreditation Council balances the requirements of the principles of the National Law and efficient business processes.

Operational management – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about operational management is primarily at page 9 of the report from ANZPAC published on the Board's website at www.podiatryboard.gov.au.

5.4 Accreditation standards (Domain 4):

The Accreditation Council develops accreditation standards for the assessment of programs of study and education providers

Attributes

- Standards meet relevant Australian and international benchmarks.
- Standards are based on the available research and evidence base.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The Accreditation Council reviews the standards regularly.
- In reviewing and developing standards, the Accreditation Council takes account of AHPRA's Procedures for Development of Accreditation Standards and the National Law.

Accreditation standards - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about accreditation standards is primarily at pages 10-11 of the report from ANZPAC published on the Board's website at www.podiatryboard.gov.au.

5.5 Processes for accreditation of programs of study and education providers (Domain 5):

The Accreditation Council applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers

Attributes

- The Accreditation Council ensures documentation on the accreditation standards and the procedures for assessment is publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. It's policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess professional programs of study and their providers against the accreditation standards.
- There are procedures for identifying, managing and recording conflicts of interest in the work of accreditation assessment teams and working committees.
- The Accreditation Council follows documented processes for decision-making and reporting that comply with the National Law and enable decisions to be made free from undue influence by any interested party.
- Accreditation processes facilitate continuing quality improvement in programs of study by the responsible education provider.
- There is a cyclical accreditation process with regular assessment of accredited education providers and their programs to ensure continuing compliance with standards.
- The Accreditation Council has defined the changes to programs and to providers that may affect
 the accreditation status, how the education provider reports on these changes and how these
 changes are assessed.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Processes for accreditation of programs of study and education providers – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily at pages 12-14 of the report from ANZPAC published on the Board's website at www.podiatryboard.gov.au and is also based on the experience of the Board in receiving accreditation reports for the accreditation decisions reported to the Board in the period 1 July 2010 to 1 August 2012.

5.6 Assessing authorities in other countries (than Australia) (Domain 6):
The Australian and New Zealand Podiatry Accreditation Council does not currently undertake the functio of assessing assessment authorities in other countries.

5.7 Assessing overseas qualified practitioners (Domain 7):

Where this function is exercised by the Accreditation Council, the authority has processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of overseas qualified practitioners who are seeking registration in the profession under the National Law and whose qualifications are not approved qualifications under the National Law for the profession

Attributes

- The assessment standards define the required knowledge, clinical skills and professional attributes necessary to practise the profession in Australia.
- The key assessment criteria, including assessment objectives and standards, are documented.
- The Accreditation Council uses a recognised standard setting process and monitors the overall performance of the assessment.
- The procedures for applying for assessment are defined and published.
- The Accreditation Council publishes information that describes the structure of the examination and components of the assessments.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessors. Its policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess overseas qualified practitioners.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

Assessing overseas qualified practitioners - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about assessing overseas qualified practitioners is primarily at pages 16-17 of the report from ANZPAC published on the Board's website at www.podiatryboard.gov.au.

5.8 Stakeholder collaboration (Domain 8):

The Accreditation Council works to build stakeholder support and collaborates with other national, international and/or professional accreditation authorities

Attributes

- There are processes for engaging with stakeholders, including governments, education institutions, health professional organisations, health providers, national boards and consumers/community.
- There is a communications strategy, including a website providing information about the Accreditation Council's roles, functions and procedures.
- The Accreditation Council collaborates with other national and international accreditation organisations.
- The Accreditation Council collaborates with accreditation authorities for the other registered health professions appointed under the National Law.
- The Accreditation Council works within overarching national and international structures of quality assurance/accreditation.

Stakeholder collaboration - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily at pages 18-19 of the report from ANZPAC published on the Board's website at www.podiatryboard.gov.au.

6. Preliminary conclusion of the National Board about whether current arrangements are satisfactory

The Podiatry Board of Australia has undertaken a preliminary review of the current arrangements, including an analysis of risks, benefits and costs. The review was based on the submission provided by the Board's accreditation council, ANZPAC against the Quality Framework for the Accreditation Function as referenced in section 5 above and the Board's experience working with ANZPAC over the last two years.

Proposed decision of the National Board based on a preliminary review of current arrangements including analysis of risks, benefits and costs

Based on its preliminary review, the view of the Podiatry Board of Australia is to continue the current arrangements of exercising accreditation functions through ANZPAC.

To what extent are you in agreement with the preliminary view of the Board?

Strongly disagree

Strongly agree

❖ Please provide comments about the Board's preliminary view



89 Nicholson Street, Brunswick East Vic 3057

Phone: +61 3 9416 3111 \ Fax: +61 3 9416 3188 Email: apodc@apodc.com.au \ Web: www.apodc.com.au

Australasian Podiatry Council

ABN: 24 008 488 748

Australasian Podiatry Council

Feedback on the Consultation Document

Accreditation Arrangements

1 November 2012

General Comments

The Australasian Podiatry Council (APodC) thanks the Podiatry Board of Australia (the Board) for the opportunity to respond to the consultation paper.

In general, the APodC acknowledges the work done by the ANZPAC over recent years to accredit programs leading to registration and overseas trained podiatrists. Ensuring education standards assist to protect public safety is an important function as it ensures public confidence in podiatrists as clinicians.

The APodC support the current model of accreditation where the ANZPAC is contracted to perform these important tasks.

The APodC further acknowledge that there has been significant work to be undertaken by ANZPAC over recent years and that this has been a busy time for the organization. The APodC would encourage the Board to seek an ongoing commitment from ANZPAC to engage more regularly and formally with key stakeholders including ourselves. We contend that the APodC plays a significant role in representing podiatrists in Australia and that this role warrants regular engagement.

Response to the specific questions asked

Specific responses have been provided in the specified form attached.

For further information:

Damian Mitsch Chief Executive Officer Australasian Podiatry Council 89 Nicholson Street Brunswick East VIC 3057 Australia T: +61 3 9416 3111 F: +61 3 9416 3188

Website: http://www.apodc.com.au/