

Health Professions Accreditation Councils' Forum

February 2013

The Secretary
Legal and Social Issues Committee
Legislative Council
Parliament House
Spring Street
Melbourne VIC 3002

Email: lsic@parliament.vic.gov.au

Inquiry into the Performance of the Australian Health Practitioner Regulation Agency

The Health Professions Accreditation Councils' Forum is pleased to have the opportunity to make a submission to the Legal and Social Issues Committee of the Legislative Council concerning its Inquiry into the Performance of the Australian Health Practitioner Regulation Agency.

About the Health Professions Accreditation Councils' Forum

The Health Professions Accreditation Councils' Forum ('the Forum') is a coalition of the accreditation Councils of the regulated professions. Each of the Councils is appointed under the *Health Practitioner Regulation National Law Act 2009* (the National Law) as the accreditation authority for the relevant profession-specific National Board and is part of the National Registration and Accreditation Scheme (NRAS).

The Forum comprises:

- Australian Dental Council
- Australian Medical Council
- Australian Nursing and Midwifery Accreditation Council
- Australian Pharmacy Council
- Australian Physiotherapy Council
- Australian Psychology Accreditation Council
- Australian and New Zealand Osteopathic Council
- Australian and New Zealand Podiatry Accreditation Council
- Council on Chiropractic Education Australasia Inc.
- Optometry Council of Australia and New Zealand
- Occupational Therapy Council (Australia and New Zealand)Ltd

The Forum has been meeting regularly since 2007 to consider matters of common interest, principally matters concerning the accreditation of education and training programs in the health professions.

The Forum responds collectively to consultation processes and papers on matters common to the relevant professions.

This submission constitutes the response of the Forum and is confined to general issues that are common to all the health professions. Each member Council may make a separate submission.

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The views expressed below do not override any views expressed by a member Council in its own separate submission.

Relationship between the Health Professions Accreditation Councils' Forum and the Australian Health Practitioner Regulation Agency

Accreditation authorities have formal contractual relationships with AHPRA under Section 44 of the National Law, the terms of which have been agreed by the National Board for each profession. Accreditation is funded partly through fees charged for accreditation functions and subsidised by registration fees at a level negotiated each year with AHPRA and national boards under the accreditation agreements.

Since the commencement of the National Registration and Accreditation Scheme for the Health Professions in 2010, the accreditation Councils appointed to undertake the accreditation functions under the National Law for the National Registration and Accreditation Scheme (NRAS) have worked closely with the staff of the national Australian Health Practitioner Regulation Agency (AHPRA) and the national registration boards which they support. This work has focused on establishing effective and transparent operation of the accreditation functions under the NRAS and in meeting the requirements of the National Law, and it has proved to be a very challenging time indeed considering the rapid pace at which the Scheme was implemented, the complexity of the task and the extent of the changes to be achieved.

AHPRA, the National Boards and the Forum have established an Accreditation Liaison Group which meets regularly to ensure that matters related to the accreditation functions under the National Law are discussed and considered by all parties.

Performance of the Australian Health Practitioner Regulation Agency

The Forum notes that the terms of reference of the Inquiry concern the performance of AHPRA, including its cost effectiveness, regulatory efficiency and ability to protect the Victorian public.

The experience of the members of the Forum is that AHPRA has paid attention to containment of the costs associated with accreditation functions during funding negotiations, on some occasions proving challenging for Councils which are dependent on income from registration fees to carry out their regulatory functions.

On the issue of regulatory efficiency, the Forum is aware of the problems experienced by some health practitioners with registration functions early in the establishment of the Scheme, some of which had an impact on our Councils, and these were explored in detail by the Senate's Finance and Public Administration References Committee in 2011. In our experience these problems have now been addressed or ameliorated.

The accreditation functions which are provided by the Accreditation Councils are part of the regulatory systems which make up the NRAS and which ultimately protect the public. As AHPRA, the National Boards and the accreditation authorities (the Councils) have shared responsibilities under the National Law, they need to work cooperatively to meet the objectives of the Scheme. The Councils of the Forum therefore work closely with AHPRA in discharging their responsibilities under the legislation and interact on a daily basis with AHPRA and the National Boards.

Despite the fact that there may have been some disagreements and tension between Councils and AHPRA during the implementation of the Scheme, the collective experience is that AHPRA has consulted, worked with the Councils co-operatively, and dealt with matters about which there were concerns in a professional and balanced way.

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Regarding the NRAS functions with which the accreditation Councils are involved; the Councils are of the view that AHPRA has generally administered them as efficiently as could be expected given its resources, the magnitude of the task, and the implementation timetable it had to work to.

In order for the NRAS to effectively protect the public, it relies on efficient cooperation between national registration boards, the accreditation Councils and a number of other bodies which have roles to play in the Scheme, with AHPRA providing key administrative, support and liaison functions. The experience of the Councils in the Forum to date is that AHPRA works in an effective, inclusive and efficient manner in undertaking its duties in the public interest. The Forum believes that the protection of the public has improved since the introduction of the NRAS.

Should the Committee require further information the Chair of the Health Professions Accreditation Councils' Forum would be happy to expand on the comments made in this submission on behalf of the Forum.

Ms Peggy Sanders
Forum Secretariat
0438 624 542
info@healthprofessionscouncils.org.au