

30 April 2018

## **Forum Response to *The Higher Education Standards Panel's advice on the impacts of professional accreditation in higher education***

### **About the Health Professions Accreditation Collaborative Forum**

The Health Professions Accreditation Collaborative Forum ('the Forum') is a self-funded coalition of the accreditation entities of the regulated professions. Each of these entities 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', or 'the Scheme').

The Forum members are:

- Aboriginal and Torres Strait Islander Health Practice Accreditation Committee (ATSIHPAC)
- Australian Dental Council (ADC)
- Australian Medical Council (AMC)
- Australian Nursing and Midwifery Accreditation Council (ANMAC)
- Australian Pharmacy Council (APC)
- Australian Physiotherapy Council Ltd (APhysioC)
- Australian Psychology Accreditation Council (APAC)
- Australasian Osteopathic Accreditation Council (AOAC)
- Australian and New Zealand Podiatry Accreditation Council (ANZPAC)
- Chinese Medicine Accreditation Committee (CMEA)
- Council on Chiropractic Education Australasia (CCEA)
- Medical Radiation Practice Accreditation Committee (MRPAC)
- Occupational Therapy Council (Australia and New Zealand) Ltd (OTC)
- Optometry Council of Australia and New Zealand (OCANZ)

A submission made by the Forum constitutes the shared response of the Forum members. Any member accreditation authority may make a separate submission. The views expressed do not override any views expressed by a member in its own separate submission. Members have agreed to the content of this submission and the principles outlined, however it is not possible to represent the views of each member on each and every matter raised in the questions posed, and a member may address specific matters in its own submission in more depth.



## Introduction

The Forum welcomes the opportunity to comment on “The Higher Education Standards Panel’s advice on the impacts of professional accreditation in higher education” (‘the Report’). The Forum acknowledges the Panel’s concern regarding duplication in any standards areas that might overlap, and is interested in discussing mechanisms for avoiding such duplication. The following comments on the Report’s recommendations outline Forum views.

## Recommendation 1: Delineation of responsibilities between academic and professional accreditation

Overlap and duplication between professional accreditation bodies and TEQSA was a theme in the PhillipsKPA report, Professional Accreditation - Mapping the Territory<sup>1</sup>, and in the 2017 Accreditation Systems Review Draft Report<sup>2</sup>. However in both instances it was difficult to establish to what extent those criticisms were directed specifically at NRAS accreditation. In its discussions with Professor Woods during the course of the Accreditation Systems Review, the Forum requested, but did not receive, specific evidence of this overlap<sup>3</sup>. In informal Forum member conversations with TEQSA on this topic, TEQSA has indicated that it does not see a significant problem in overlap with NRAS authorities. Lack of clarity may arise from the large number of professional accreditation bodies (estimated at more than a hundred in the PhillipsKPA report) and the difficulties in building an appropriately differentiated picture of the problem from this large sample.

As you are aware, TEQSA assesses at the level of the institution, whereas health profession accreditation seeks application of the relevant professional standards to the level of the program of study, and the academic unit responsible for that program. That is not to say that overlap between the work of NRAS and TEQSA does not occur, as there are areas of potential confusion concerning regulatory roles and boundaries. However the following factors indicate the potential for this problem is limited:

- The fourteen NRAS health professions are governed by a separate legal instrument, the National Law, that undertakes to ensure that “the program of study, and the education provider that provides the program of study, meet an *approved accreditation standard for the profession*”<sup>4</sup>. This specific undertaking informs a number of governance measures and responsibilities for authorities operating within the Scheme



- Forum members must follow AHPRA guidelines concerning the development and review of accreditation standards, which include requirements for international benchmarking, wide-ranging stakeholder consultation, consideration of COAG Principles for Best Practice Regulation, and liaison with the Office of Best Practice Regulation
- Forum members themselves are subject to review by their National Boards. Every six months accreditation authorities report to their respective National Boards on developments relevant to the eight domains of good practice in the Quality Framework<sup>5</sup>. Continuation of accreditation functions by authorities is not automatic, and accreditation arrangements are under review by the National Boards this year. The Forum considers these measures, together with the regular reporting to national boards on accreditation decisions, provide a strong framework for oversight of the scope of the work of the accreditation authorities.
- The Forum has also developed and agreed to a common set of high level accreditation principles (see Appendix A). According to the PhillipsKPA report, “Apart from aspects that are specific to the function of the legislation and the National Registration and Accreditation Scheme, these principles are basically congruent with those produced by Universities Australia and Professions Australia to which members of the Forum were contributors. (p50)”<sup>1</sup>
- Most of the NRAS accreditation authorities have acquired a degree of maturity in their operations. Furthermore, assessment panels often include senior staff from universities who are aware of regulatory distinctions between professional and academic accreditation.

It is worth recalling that TEQSA’s main purpose is to “safeguard student interests and the reputation of Australia’s higher education sector”<sup>6</sup>, whereas the main aim of NRAS professional accreditation is upholding standards in the public interest. Additional legislation related to the TEQSA Act 2011 may have the result of complicating the operation of the National Law and its objective of protecting the public.

The Forum believes that it would be preferable, at least from the point of view of avoiding overlap with NRAS accreditation authorities, to follow the Panel’s option c) under Recommendation 1. This could entail modifications, for example, to the

Forum's High Level Accreditation Principles to make avoidance of overlap more explicit as a guiding principle.

### **Recommendation 2: Building the capacity of professional bodies**

In addition to changes to voluntary codes of practice, the Forum believes it makes sense to reduce duplication by strengthening the working relationship between NRAS accreditation and TEQSA. The Report includes a range of initiatives that could improve bilateral understanding of our respective areas of responsibility, including those options set out on page 6 of the Report under 'activities that could be developed and managed within current responsibilities and resources'. For example, existing MOUs could be strengthened to include a commitment to lessening the burden of regulation, and new MOUs negotiated which include such provisions. Both NRAS and TEQSA have their respective areas of responsibility and expertise, and improving bilateral communication would strengthen the processes, policies and operations of accreditation as well as reducing duplication and overlap.

### **Recommendation 3: Forum on Future of Professional Work**

The Report raises interesting questions with regard to the impact of new technologies and artificial intelligence on the future of professional work. The Forum believes that, in the short to medium term, these technologies are likely to increase, rather than decrease, regulatory workload. For example, artificial intelligence is raising regulatory issues in terms of privacy, patient protection and the structure of professional work and training. New roles, such as "para-professionals" who are equipped to undertake tasks previously done by senior professionals, will need to be monitored as they emerge. Issues such as technological transparency and the issue of agency (who is making the decision) may cause regulatory difficulties. There are many distinct permutations of the problem, as technology is likely to affect different parts of professional practice in different ways and degrees, and at different speeds. Ethical and regulatory standards will increasingly need to take developments such as these into account. The Forum believes substantial investments will need to be made by governments and regulators to avoid lagging behind technological change.

In light of this, the Forum believes it is premature to anticipate homogenising effects of technology on regulation. While there could be merit in bringing interested parties together to discuss the impact of technology on professional work, the Forum hopes that it will be possible to conduct open-minded discussions without anticipating conclusions at this stage.



The Forum appreciates the opportunity to provide input regarding the Panel's recommendations on the impacts of professional accreditation on higher education, and would welcome an opportunity for further discussions with the Panel on these or other issues of common interest.

1. <https://docs.education.gov.au/documents/professional-accreditation-mapping-territory>
2. <https://www.coaghealthcouncil.gov.au/Projects/Accreditation-Systems-Review>
3. Forum meeting with ASReview team, 15 September 2017
4. From the National Law (italics added)  
<https://www.legislation.qld.gov.au/view/whole/html/2017-10-11/act-2009-045>
5. <http://www.hpacf.org.au/statementsandpositionpapers/>
6. <https://www.teqsa.gov.au/what-we-do>

#### **APPENDIX A: Forum High Level Accreditation Principles**

1. We base our work and processes on the objectives of the National Registration and Accreditation Scheme (NRAS).
2. Our work is to protect the public by ensuring high quality education and training.
3. We work collaboratively with all bodies within the NRAS.
4. We will use a “right-touch” approach to accreditation.
5. We will benchmark our standards and accreditation processes to international standards.
6. We use our close connections with our professions to achieve objectives of the National Law.
7. We will develop accreditation standards that give priority to outcomes and results, and encourage improvement and innovation in education programs.
8. Where possible, we will build common approaches to accreditation standards and processes, while maintaining our own profession-specific requirements.
9. We collaborate and learn from other accreditation bodies.
10. We consult our education providers on accreditation processes and procedures.
11. We will maximise service and effectiveness through efficient and cost-effective accreditation processes.
12. We will ensure members of accreditation committees and staff have expertise and experience to deliver accreditation functions.