

26 October 2018

NRAS Review Implementation Project Secretariat
Health and Human Services Regulation and Reform
Department of Health and Human Services
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By email: NRAS.consultation@dhhs.vic.gov.au

To Whom It May Concern;

Public consultation – Regulation of Australia's health professions: keeping the National Law up to date and fit for purpose

The Health Professions Accreditation Collaborative Forum (the Forum) welcomes the opportunity to provide feedback on the reforms to the National Registration and Accreditation Scheme (National Scheme) as proposed by the COAG Health Council.

Representing the 14 appointed accreditation authorities in the National Scheme under the *Health Practitioner Regulation National Law Act 2009* (National Law), the Forum contributes to issues of national importance to the regulated health professions, particularly in relation to the accreditation of education, training and continuing professional development. Many of the Forum's accreditation authorities also assess overseas trained practitioners. Our shared commitment to use accreditation as a lever should also include using this function in each profession.

Regarding the changes proposed under the consultation paper, the Forum welcomes the proposal to reference the cultural safety for Aboriginal and Torres Strait Islander Peoples in the objectives and guiding principles of the National Law. This response specifically addresses those questions posed by the COAG Health Council relating to the incorporation of cultural safety into the National Law. Where possible, the Forum has provided evidence or commentary to support the comments made.

1. Should the guiding principles of the National Law be amended to require the consideration of cultural safety for Aboriginal and Torres Strait Islander Peoples in the regulatory work of National Boards, AHPRA, Accreditation Authorities and all entities operating under the National Law? What are your reasons?

The Forum supports this proposal of the COAG Health Council.

As outlined in the consultation document, the National Scheme has an important role to play in supporting health outcomes for Aboriginal and Torres Strait Islander Peoples by enabling a health workforce which is culturally safe, accessible, and responsive through its regulatory framework for health practitioners. The Forum understands achieving this requires a shared commitment across all entities operating under the National Law.

Including cultural safety in the guiding principles of the National Law will formalise an existing commitment of the entities operating under the National Scheme. On 5 July 2018, 37 health organisations, including the 14 accreditation authorities comprising the Forum, signed the National Accreditation Scheme Statement of Intent. For the groups involved, the signing of the Statement of Intent reinforces a sector-wide commitment to ensure Aboriginal and Torres Strait Islander Peoples have access to culturally safe health services, free of racism.

For the Forum, the Statement of Intent supports the shared commitment to use accreditation as a strong lever in the National Scheme, contributing to the development of future health practitioners with the skills and knowledge to advance the health and wellbeing of all Australians. This includes working with education providers, Aboriginal and Torres Strait Islander Peoples, and across professions in pursuit of this shared outcome.

This work goes beyond the production of a health workforce, which is culturally safe. It also ensures practitioner programs have the mechanisms in place to provide support to those students identifying as Aboriginal and/or Torres Strait Islander, so they can go on to play a vital role in the workforce and community.

Adding the consideration of cultural safety into the objectives and guiding principles of the National Scheme explicitly highlights the need for due consideration to the effects on the health and wellbeing of Aboriginal and Torres Strait Islander Peoples. It also ensures the consistent application of cultural safety in registration and accreditation standards across all professions operating under the National Scheme.

2. Should the objectives of the National Law be amended to require that an objective of the National Scheme is to address the health disparities between Indigenous and non-Indigenous Australians? What are your reasons?

The Forum supports this proposal of the COAG Health Council.

The embedding of an objective to address the health disparities between Indigenous and Non-Indigenous Australians ensures those entities operating under the scheme work collectively towards the improvement of Indigenous health outcomes.

Achieving equity in the health outcomes between Aboriginal and Torres Strait Islander Peoples and other Australians by 2031 is a key commitment for the health accreditation sector. To understand the role accreditation plays in the space, the Forum developed the *Role of accreditation in improving Aboriginal and Torres Strait Islander health outcomes project* (the Project) in 2018.

Involving a thematic review of education providers, and a survey of accreditation decision makers, the Project aims to determine the degree in which health practitioner programs work to produce culturally safe workers and understand how education providers support those students identifying as Aboriginal and/or Torres Strait Islander. Additionally, the Forum is using the Project to determine the degree to which Indigenous Peoples' voices are involved in the decision-making process of the accreditation authorities.

Initial analysis indicates there is an excellent opportunity for cross profession learning and an in-depth analysis of the data is underway and is due for completion in early 2019.

Going forward, the Forum will use the information collected to inform future projects and potential policy changes designed to assist in the development of a culturally safe health workforce and, in turn, improve health outcomes for Aboriginal and Torres Strait Islander Peoples.

3. Do you have any other suggestions for how the National Scheme could assist in improving cultural safety and addressing health disparities for Aboriginal and Torres Strait Islander Peoples?

Addressing health disparities and ensuring the development of a culturally safe workforce within the National Law and National Scheme is only part of a much bigger scope of work needed to deal with the disparities surrounding Aboriginal and Torres Strait Islander health. As stated in the Prime Minister's reports on Closing the Gap targets, progress on this issue is slow and, in its current state, the nation is not on track to meet any of the recognised targets.

To ensure meaningful change around this societal issue, Health Ministers, at state and federal level, need to consider greater understanding and endorsement, not only of policy directives, but also the needs of Indigenous Australians, as defined by Indigenous Australians, across all health professions.

Overall, the Forum supports the COAG Health Council's high level proposal to improve the referencing of improved cultural safety for Aboriginal and Torres Strait Islander Peoples under the National Law, we look forward to seeing the specific drafting proposals.

I am available to discuss the rationale behind the commentary included in this submission. Should you wish to discuss this further, please email me at info@hpacf.org.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'B Clark', written in a cursive style.

Ms Bronwyn Clark
Chair
Health Professions Accreditation Collaborative Forum