Wednesday 8 October 2014

Mr Kim Snowball
Independent Reviewer
NRAS Review
Australian Health Ministers’ Advisory Council

Email: nras.review@health.vic.gov.au

Dear Mr Snowball

A submission in response to the Consultation Paper, August 2014, for the Review of the National Registration and Accreditation Scheme for health professions commissioned by the Australian Health Ministers’ Advisory Council

The School of Psychology at The University of Queensland is pleased to have the opportunity to make a submission in response to the Consultation Paper for the Review of the National Registration and Accreditation Scheme for the health professions. The School of Psychology at UQ is one of the largest in Australia, with a suite of accredited postgraduate qualifications in psychology that come under the National Registration Scheme.

As an entity that admits over 100 students annually for postgraduate training, and with a large commitment to supporting our postgraduate psychology alumni throughout their professional careers, we are keen to see the National Registration and Accreditation Scheme work well for professionals in practice, the public at large, and for training institutions. As a research intensive department with a particular interest in both evidence-based practice as well as research into teaching and learning initiatives, we strongly ascribe to data-driven approaches to accreditation and evaluation of professional conduct.

Thus we would like to make a brief submission in response to specific questions in the consultation paper which we felt particularly important to comment on from our perspective as an education provider and training institution. Our representative Professor Nancy Pachana attended the consultation meeting in Brisbane on the 19th of September and participated in roundtable discussions with feedback, but we as a School also wish to submit a formal submission.

Specific questions

9. What changes are required to improve the existing complaints and notifications system under the National Scheme?

10. Should the co-regulatory approach in Queensland, where complaints are managed by an independent commissioner, be adopted across all States and Territories?
11. Should there be a single entry point for complaints and notifications in each State and Territory?

It was apparent both from the consultation document as well as discussion at the Brisbane consultation meeting that complaints and notifications processes is complex, and more importantly appears to be unclear to many of those raising concerns as well as those against whom complaints are raised. Further, the consultation paper notes that approximately 60 per cent of notifications assessed by the National Boards result in a finding of no further action. We strongly support BOTH clearer information for consumers and professionals to understand the nature of the complaints and notifications processes, and more streamlined ways of managing the process. Thus we support a single entry point for complaints and notifications in each State and Territory. Changes to improve the complaints and notifications scheme could include making parties aware of the value of pursuing a stepped approach to seeking resolution when matters arise of concern, with consideration of the seriousness of the believed infraction, such that perhaps more minor misunderstandings or concerns could be resolved among the parties themselves without immediate referral of all concerns directly to the national body. Further, a more flexible adoption of alternative dispute resolution processes to handle some cases could also assist in better management of workflows with respect to complaints and notifications.

With respect to the co-regulatory approach here in Queensland, we feel that this has been in operation for only a few months, so any appraisal of its functionality is premature.

20. To what extent are National Boards and Accrediting Authorities meeting the statutory objectives and guiding principles of the National Law, particularly with respect to facilitating access to services, the development of a flexible, responsive and sustainable health workforce, and innovation in education and service delivery?

In terms of meeting the guiding principles of the National Law, particularly with respect to facilitating innovation in education, we feel strongly that Universities train professionals for participation in the current healthcare and workforce environment, as well as training such graduates to be able to work and adapt to a changing workplace and healthcare environment. Thus allowing for education providers to be innovative in the delivery of curricula is essential. We note with satisfaction the recent reconstitution of one of the national accreditation bodies, the Australian Psychology Accreditation Council (APAC), which recently moved to include in its makeup of its Board of Directors representatives from the Schools of Psychology nationally. This has led to vibrant and productive conversations about how to better engage education providers with the accreditation process and how to ensure that high standards for education, benchmarked against national and international criteria, continue to evolve rather than ossify. We would urge that all such accreditation bodies actively engage tertiary education providers on their Boards and in their deliberations regarding accreditation.

We would like to conclude our submission with a suggestion that the Review of the National Registration and Accreditation Scheme take the opportunity to encourage
further empirical research on the many aspects of the Scheme amenable to study. How consumers view the registration of complaints, the development and implementation of competency frameworks for practitioners, and evaluation of outputs (e.g. high quality practitioners in the workplace) as opposed to inputs (e.g. specific topics or personnel components of training programs and curricula) are important to undertake and should be supported by the government. We note, as was raised in the Brisbane consultative meeting last month, that the Australian government’s Office for Learning and Teaching (OLT) promotes and supports change in higher education institutions for the enhancement of learning and teaching. We believe that a particular emphasis on such grants to encourage research on topics related to national registration and accreditation is timely and required to ensure a high quality, flexible and accountable health workforce into the future.

Sincerely

[Signature]

Professor Virginia Slaughter
Head of School