



**AUSTRALIAN  
NURSING  
FEDERATION**

**victorian**

BRANCH

7 December 2012

**Julie Reeves  
Senior Policy Officer  
Australian Health Practitioners Regulation Agency  
Nursing and Midwifery Board of Australia  
GPO Box 9958  
MELBOURNE Vic 3001**

Via e-mail: [accreditationreview@ahpra.gov.au](mailto:accreditationreview@ahpra.gov.au)

Dear Julie

**RE: Review of Accreditation Arrangements for the Nursing and Midwifery Professions**

Please find attached two Consultation Papers from the Australian Nursing Federation (Vic Branch).

One paper is in response of our Registered Training Organisation and the other from us as a professional and industrial stakeholder in the nursing and midwifery professions.

We look forward to hearing the outcome of the accreditation arrangement review.

Should you have any additional comments or questions in relation to our submissions please contact Mark Staaf - Professional Officer, or Ann Vintiadis – Education Centre Manager on 9275 9333.

Yours sincerely

**Lisa Fitzpatrick  
Secretary, ANF Victorian Branch**

Australian Nursing Federation (Victorian Branch)

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## Consultation paper

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### Review of accreditation arrangements for the nursing and midwifery professions

**This consultation paper seeks feedback on the Nursing and Midwifery Board of Australia's review of accreditation arrangements for the nursing and midwifery professions.**

Please:

- provide feedback by completing the attached paper, preferably electronically, using the spaces and tick boxes provided.
- save the document with your name and the name or acronym of the accreditation council (in this case ANMAC) in the document name.
- e-mail the document to [accreditationreview@ahpra.gov.au](mailto:accreditationreview@ahpra.gov.au) by close of business Friday on 7 December 2012.

### How your submission will be handled

Detailed information regarding the management of submissions is available on [page 7](#) of this consultation paper.

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30 October 2012

### Accreditation arrangements for the nursing and midwifery professions

#### Preamble

The Health Practitioner Regulation National Law as in force in each state and territory (the National Law) requires the National Boards for the first 10 professions to enter the National Registration and Accreditation Scheme to review the arrangements for the exercise of the accreditation functions no later than 30 June 2013.

These arrangements have been in place since before the commencement of the National Law and involve the appointment of an external Accreditation Council for each of the first 10 professions to join the National Registration and Accreditation Scheme (the National Scheme) on 1 July 2010<sup>1</sup>.

When the Australian Health Workforce Ministerial Council (AHWMC) appointed the first of the accreditation councils, they indicated that the assignment of accreditation functions would be 'subject to the requirement to meet standards and criteria set by the national agency [the Australian Health Practitioner Regulation Agency (AHPRA)] for the establishment, governance and operation of external accreditation bodies'.

The National Law provides that:

- *the National Board..... must decide whether an accreditation function for the health profession for which the Board is established is to be exercised by (a) an external accreditation entity; or (b) a committee established by the Board (s43), and*
- *the National Board must ensure the process for the review includes wide-ranging consultation about the arrangements for the exercise of the accreditation functions (s.253 (5)).*

Given that there are already agreed arrangements in place, the review process needs to begun with an assessment of the way each Accreditation Council has performed its functions. It also takes into account the differences in size of the health professions as well as in the volume and range of accreditation activities undertaken.

#### Note on terminology

There are a number of words used to describe the accreditation entities that have been appointed to exercise functions under the National Law. The National Law uses the words 'external accreditation entity' and 'accreditation authority', and these words are used in other documents referred to in this paper. However, more commonly these organisations are referred to as Accreditation Councils, and this term is generally used in this paper.

#### Review principles

Key principles guiding the review are set out below. The *Quality Framework for the Accreditation Function* (the Quality Framework), which outlines the benchmarks agreed to by the National Boards and Accreditation Councils, is a fundamental consideration in the review process.

The key principles include:

- an agreed and transparent process for the review
- an appropriate focus on the current accreditation arrangements

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<sup>1</sup> 18 October 2010 in Western Australia

- an agreed cross-profession framework as outlined in this paper with capacity to take differences between the professions into account
- weighing of relative risks, benefits and costs, and
- evaluation of the suitability of the process for future reviews required under the National Law.

### **Review process**

The review commenced with the Nursing and Midwifery Board of Australia (National Board) writing to the Australian Nursing and Midwifery Accreditation Council (Accreditation Council) inviting them to indicate whether they wished to continue exercising accreditation functions, and if so, to provide a report to the National Board.

The National Board has reviewed this report and formed a preliminary view about whether the current arrangements for the accreditation function are satisfactory, taking into account the National Board's experience with the Accreditation Council over the past two years.

The National Board has conducted a preliminary consultation and subsequently reviewed the consultation paper in light of the feedback received.

The National Board is now consulting with all stakeholders about its preliminary view on the current arrangements for the accreditation function through this public consultation paper.

## **1. History of the assignment and requirement for the review of the accreditation arrangements**

### **Accreditation functions assigned**

The appointment of the Australian Nursing and Midwifery Accreditation Council (formerly the Australian Nursing and Midwifery Council) by the Australian Health Workforce Ministerial Council was made on 22 April 2010 to exercise the nursing and midwifery accreditation functions from 1 July 2010 until 30 June 2013.

An accreditation agreement is in place between AHPRA on behalf of the National Board and the Accreditation Council. This agreement outlines the funding provided to the Accreditation Council by the National Board to carry out the functions relating to accreditation of programs of study in Australia during the term of the agreement.

These include:

- Accrediting programs of study as provided for in section 48 of the National Law
- Monitoring programs of study as provided for in section 50 of the National Law
- Submitting reports on programs of study, including monitoring
- Advising the National Board if the Australian Nursing and Midwifery Accreditation Council refuses to accredit a program of study
- Providing advice to the National Board about matters relating to accreditation of programs of study as required.
- Undertake the following functions relating to the development of accreditation standards during the term of the agreement:
  - Advice about accreditation standards
  - Review and/or development of agreed accreditation standards following consultation with NMBA as to the prioritisation and in accordance with available resources. This includes:
    - review of accreditation standards for the Registered Nurse in 2011/2012
    - review of accreditation standards for the Registered Midwife in 2012/2013.

## **Past history of accreditation functions prior to the National Scheme**

Prior to implementation of the National Scheme, all accreditation functions for nursing and midwifery were managed through the previous state and territory nursing and midwifery boards in accordance with the relevant state or territory legislation..

## **Background to accreditation under the National Law**

National Boards and Accreditation Councils (through the Forum of Australian Health Professions Councils) have developed a document that provides background to accreditation under the National Law.

This is available at: [www.healthprofessionscouncils.org.au/AHPRA-Reference-Accreditation-under-the-Health-Practitioner-Regulation-National-Law-Act.pdf](http://www.healthprofessionscouncils.org.au/AHPRA-Reference-Accreditation-under-the-Health-Practitioner-Regulation-National-Law-Act.pdf).

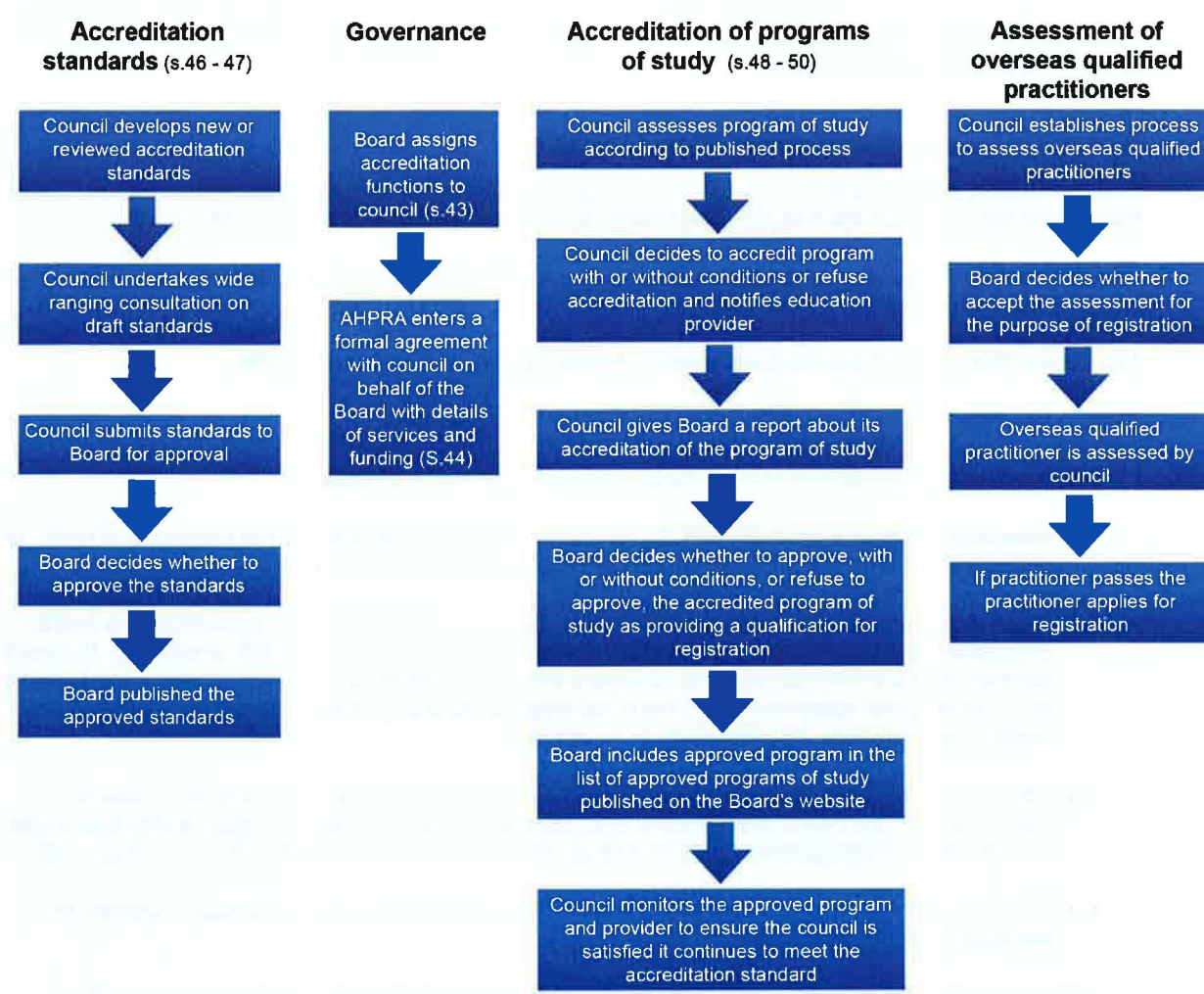
## **The respective roles of the National Board, Accreditation Council and AHPRA**

Section 42 of the National Law defines the accreditation function as:

- (a) developing accreditation standards for approval by a National Board
- (b) assessing programs of study, and the education providers that provide the programs of study, to determine whether the programs meet approved accreditation standards
- (c) \*assessing authorities in other countries who conduct examinations for registration in a health profession, or accredit programs of study relevant to registration in a health profession, to decide whether persons who successfully complete the examinations or programs of study conducted or accredited by the authorities have the knowledge, clinical skills and professional attributes necessary to practise the profession in Australia or
- (d) \*overseeing the assessment of the knowledge, clinical skills and professional attributes of overseas qualified health practitioners who are seeking registration in a health profession under this Law and whose qualifications are not approved qualifications for the health profession or
- (e) \*making recommendations and giving advice to a National Board about a matter referred to in paragraph (a), (b), (c) or (d).

*\* The Accreditation Council for nursing and midwifery currently does not undertake s42(c) and (d) for the National Board.*

The following diagram describes the respective roles of the National Board, Accreditation Council and AHPRA.



## 2. Scope of the National Board review

### Options open to the National Board

The following options are open to the National Board:

1. continue the existing arrangements of assigning accreditation functions to the Accreditation Council
2. appoint an alternative external accreditation entity, where an entity with the appropriate skills, expertise and infrastructure exists and is willing to take on the role
3. establish an accreditation committee of the National Board

A combination of some of the above options may also be possible.



### 3. Consultation process

#### **Making a submission**

Section 6 of this consultation paper sets out each domain of the Quality Framework and refers to the evidence that the National Board has considered in forming its view about how the current accreditation arrangements are working.

Information provided by the Accreditation Council describing how it has undertaken the accreditation functions is attached and referenced for each domain.

There are spaces for comments throughout the paper.

To make a submission:

1. please save the document as a word document;
2. complete your comments in the spaces provided;
3. save the document with your name and the name or acronym of the Accreditation Council in the document name; and
4. email the document to [accreditationreview@ahpra.gov.au](mailto:accreditationreview@ahpra.gov.au) by close of business Friday on 7 December 2012.

#### **How submissions will be handled**

As part of the public consultation process, the National Board will acknowledge submissions received.

Submissions will generally be published unless you request otherwise. The National Board publishes submissions on its [website](#) to encourage discussion and inform the community and stakeholders.

However, the National Board will not place on its website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of reference. Before publication, the National Board may remove personally-identifying information from submissions, including contact details.

The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the National Board.

The National Board also accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let the National Board know if you do not want us to publish your submission, or want us to treat all or part of it as confidential.

However, due to the nature of this review, while there may be a request not to publish a submission publicly, the National Board will provide all submissions to the Accreditation Council.

The National Board may choose to consult with key stakeholders individually in addition to the National Board's broader consultation processes published at <http://www.ahpra.gov.au/Legislation-andPublications/AHPRA-Publications.aspx>

If you would like clarification or further information about any aspects of this consultation process, please contact Julie Reeves, Senior Policy Officer by email: [Julie.reeves@ahpra.gov.au](mailto:Julie.reeves@ahpra.gov.au) or by phone: (03) 8708 9363.

#### 4. Your submission

**Name of person or organisation**

**making the submission:** Australian Nursing Federation - Victorian Branch

**Contact person:** Lisa Fitzpatrick

**Telephone:** [REDACTED]

**Email:** [REDACTED]

#### 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 Trade Union

❖ **What experience have you had with the Accreditation Council?** (please tick all that apply)

**Education Providers -**

- ☐ The Accreditation Council has undertaken an accreditation assessment of one or more of our education programs since 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 previously

❖ **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 the Accreditation Council

❖ **Other stakeholders**

- ☒ Have sought information or advice from the Accreditation Council on other matters
- ☒ The Accreditation Council has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments
- ☐ Involved the Accreditation Council activities eg accreditation or assessment processes
- ☐ Little or no direct engagement with the Accreditation Council
- ☒ Other –  
please specify Involved in consultation related to the Development and Review of ANMC Standards

## 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 National Board has taken into account in forming its preliminary view about governance is primarily on pages 10 to 13 of the ANMAC report published on the Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

#### ❖ Comments

The Australian Nursing Federation - Victorian Branch concurs with the above attributes in relation to the ANMAC Governance processes.

## **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 National Board has taken into account in forming its preliminary view about independence is primarily on pages 14 to 16 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

### **❖ Comments**

The Australian Nursing Federation - Victorian Branch concurs with the above attributes in relation to the ANMAC independence of its operations in our experience we see no evidence of ANMAC making decisions in relation to its operations as a result of undue influence from external parties.

### 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 National Board has taken into account in forming its preliminary view about operational management is primarily on pages 17 to 19 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

#### ❖ Comments

The Australian Nursing Federation - Victorian Branch agrees with the above attributes in relation to the ANMAC Operational Management.

There may be times when some of the operations of ANMAC have been thought to be excessively time consuming and overly onerous, however such occurrences may be attributed to an under resourcing of human assets to complete work in a timely fashion.

#### **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 National Board has taken into account in forming its preliminary view about accreditation standards is primarily on pages 20 to 21 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

##### **❖ Comments**

The Australian Nursing Federation - Victorian Branch concurs with the above attributes in relation to the ANMAC Accrediation Standards.

### **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 are publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. Its 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 National Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily on pages 22 to 24 of ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>. It is also based on the experience of the National Board in receiving accreditation reports for the accreditation decisions reported to the National Board for approval in the period 1 July 2010 to 1 August 2012.

#### **❖ Comments**

The Australian Nursing Federation - Victorian Branch is supportive of the above attributes in relation to the ANMAC Processes for accreditation of programs of study and education providers. These are acceptable processes to ensure robust proceedings for the accreditation of programs of nursing and midwifery study that lead to registration as a nurse or a midwife, or enrolment as a nurse.



### 5.6 Assessing authorities in other countries (than Australia) (Domain 6):

Where this function is exercised by the Accreditation Council, the authority has defined standards and procedures to assess examining and/or accrediting authorities in other countries

#### Attributes

- The assessment standards aim to determine whether these authorities' processes result in practitioners who have the knowledge, clinical skills and professional attributes necessary to practice in the equivalent profession in Australia.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The procedures for initiating consideration of the standards and procedures of authorities in other countries are defined and documented.
- There is a cyclical assessment process to ensure recognised authorities in other countries continue to meet the defined standards.
- The Accreditation Council follows documented systems for decision-making and reporting that enable decisions to be made free from undue influence by any interested party.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

#### Assessing authorities in other countries (than Australia) – Accreditation Council submission

#### ❖ Comments

**\* The Accreditation Council for nursing and midwifery currently does not assess authorities in other countries for the National Board and, therefore, this domain does not form part of the review**

### 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

#### ❖ Comments

***\*The Accreditation Council for nursing and midwifery currently does not assess overseas qualified practitioners for the National Board and, therefore, this domain does not form part of the review.***

### **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 National Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily on pages 25 to 28 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

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#### **❖ Comments**

The Australian Nursing Federation - Victorian Branch is supportive of the above attributes regarding ANMAC processes for Stakeholder Collaboration.

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

The National Board 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 independent Accreditation Council, the Australian Nursing and Midwifery Accreditation Council [ANMAC] against the Quality Framework for the accreditation function as referenced in section 5 above and the National Board's experience working with the Accreditation Council over the past two years.

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

The National Board formed a preliminary view based on the ANMAC submission, that the current accreditation arrangement for an independent Accreditation Council is satisfactory and, that the accreditation function for the nursing and midwifery professions is to be exercised by the Australian Nursing and Midwifery Accreditation Council beyond the period assigned by the Australian Health Workforce Ministerial Council (i.e 30 June 2013).

### ❖ **To what extent are you in agreement with the preliminary view of the National Board?**

Strongly disagree

Strongly agree

☐

1

☐

2

☐

3

☐

4

☒

5

### ❖ **Please provide comments about the National Board's preliminary view**

The Australian Nursing Federation - Victorian Branch is very supportive the view formed by the National Board that the current accreditation arrangement for an independent Accreditation Council is satisfactory and, that the accreditation function for the nursing and midwifery professions is to be exercised by the Australian Nursing and Midwifery Accreditation Council beyond the period assigned by the Australian Health Workforce Ministerial Council. This the preferred option of the profession, rather than the proposed alternative of establishing a different alternative external accreditation entity, or the establishment of an accreditation committee of the National Board.



the 1990s, the number of people in the UK who are aged 65 and over has increased by 1.5 million, and the number of people aged 75 and over by 1.2 million (Office of National Statistics 1999).

There is a growing awareness of the need to address the needs of older people in the community. The Department of Health (1999) has published a strategy for older people, which sets out a vision for the future of older people's services. The strategy is based on the following principles: older people should be able to live independently in their own homes; older people should be able to participate in the community; older people should be able to access the services they need; and older people should be able to live in a safe and secure environment.

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## Consultation paper

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**This consultation paper seeks feedback on the Nursing and Midwifery Board of Australia's review of accreditation arrangements for the nursing and midwifery professions.**

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- provide feedback by completing the attached paper, preferably electronically, using the spaces and tick boxes provided.
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30 October 2012

### Accreditation arrangements for the nursing and midwifery professions

#### Preamble

The Health Practitioner Regulation National Law as in force in each state and territory (the National Law) requires the National Boards for the first 10 professions to enter the National Registration and Accreditation Scheme to review the arrangements for the exercise of the accreditation functions no later than 30 June 2013.

These arrangements have been in place since before the commencement of the National Law and involve the appointment of an external Accreditation Council for each of the first 10 professions to join the National Registration and Accreditation Scheme (the National Scheme) on 1 July 2010<sup>1</sup>.

When the Australian Health Workforce Ministerial Council (AHWMC) appointed the first of the accreditation councils, they indicated that the assignment of accreditation functions would be 'subject to the requirement to meet standards and criteria set by the national agency [the Australian Health Practitioner Regulation Agency (AHPRA)] for the establishment, governance and operation of external accreditation bodies'.

The National Law provides that:

- *the National Board..... must decide whether an accreditation function for the health profession for which the Board is established is to be exercised by (a) an external accreditation entity; or (b) a committee established by the Board (s43), and*
- *the National Board must ensure the process for the review includes wide-ranging consultation about the arrangements for the exercise of the accreditation functions (s.253 (5)).*

Given that there are already agreed arrangements in place, the review process needs to begin with an assessment of the way each Accreditation Council has performed its functions. It also takes into account the differences in size of the health professions as well as in the volume and range of accreditation activities undertaken.

#### Note on terminology

There are a number of words used to describe the accreditation entities that have been appointed to exercise functions under the National Law. The National Law uses the words 'external accreditation entity' and 'accreditation authority', and these words are used in other documents referred to in this paper. However, more commonly these organisations are referred to as Accreditation Councils, and this term is generally used in this paper.

#### Review principles

Key principles guiding the review are set out below. The *Quality Framework for the Accreditation Function* (the Quality Framework), which outlines the benchmarks agreed to by the National Boards and Accreditation Councils, is a fundamental consideration in the review process.

The key principles include:

- an agreed and transparent process for the review
- an appropriate focus on the current accreditation arrangements

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<sup>1</sup> 18 October 2010 in Western Australia

- an agreed cross-profession framework as outlined in this paper with capacity to take differences between the professions into account
- weighing of relative risks, benefits and costs, and
- evaluation of the suitability of the process for future reviews required under the National Law.

### **Review process**

The review commenced with the Nursing and Midwifery Board of Australia (National Board) writing to the Australian Nursing and Midwifery Accreditation Council (Accreditation Council) inviting them to indicate whether they wished to continue exercising accreditation functions, and if so, to provide a report to the National Board.

The National Board has reviewed this report and formed a preliminary view about whether the current arrangements for the accreditation function are satisfactory, taking into account the National Board's experience with the Accreditation Council over the past two years.

The National Board has conducted a preliminary consultation and subsequently reviewed the consultation paper in light of the feedback received.

The National Board is now consulting with all stakeholders about its preliminary view on the current arrangements for the accreditation function through this public consultation paper.

## **1. History of the assignment and requirement for the review of the accreditation arrangements**

### **Accreditation functions assigned**

The appointment of the Australian Nursing and Midwifery Accreditation Council (formerly the Australian Nursing and Midwifery Council) by the Australian Health Workforce Ministerial Council was made on 22 April 2010 to exercise the nursing and midwifery accreditation functions from 1 July 2010 until 30 June 2013.

An accreditation agreement is in place between AHPRA on behalf of the National Board and the Accreditation Council. This agreement outlines the funding provided to the Accreditation Council by the National Board to carry out the functions relating to accreditation of programs of study in Australia during the term of the agreement.

These include:

- Accrediting programs of study as provided for in section 48 of the National Law
- Monitoring programs of study as provided for in section 50 of the National Law
- Submitting reports on programs of study, including monitoring
- Advising the National Board if the Australian Nursing and Midwifery Accreditation Council refuses to accredit a program of study
- Providing advice to the National Board about matters relating to accreditation of programs of study as required.
- Undertake the following functions relating to the development of accreditation standards during the term of the agreement:
  - Advice about accreditation standards
  - Review and/or development of agreed accreditation standards following consultation with NMBA as to the prioritisation and in accordance with available resources. This includes:
    - review of accreditation standards for the Registered Nurse in 2011/2012
    - review of accreditation standards for the Registered Midwife in 2012/2013.

### **Past history of accreditation functions prior to the National Scheme**

Prior to implementation of the National Scheme, all accreditation functions for nursing and midwifery were managed through the previous state and territory nursing and midwifery boards in accordance with the relevant state or territory legislation..

### **Background to accreditation under the National Law**

National Boards and Accreditation Councils (through the Forum of Australian Health Professions Councils) have developed a document that provides background to accreditation under the National Law.

This is available at: [www.healthprofessionscouncils.org.au/AHPRA-Reference-Accreditation-under-the-Health-Practitioner-Regulation-National-Law-Act.pdf](http://www.healthprofessionscouncils.org.au/AHPRA-Reference-Accreditation-under-the-Health-Practitioner-Regulation-National-Law-Act.pdf).

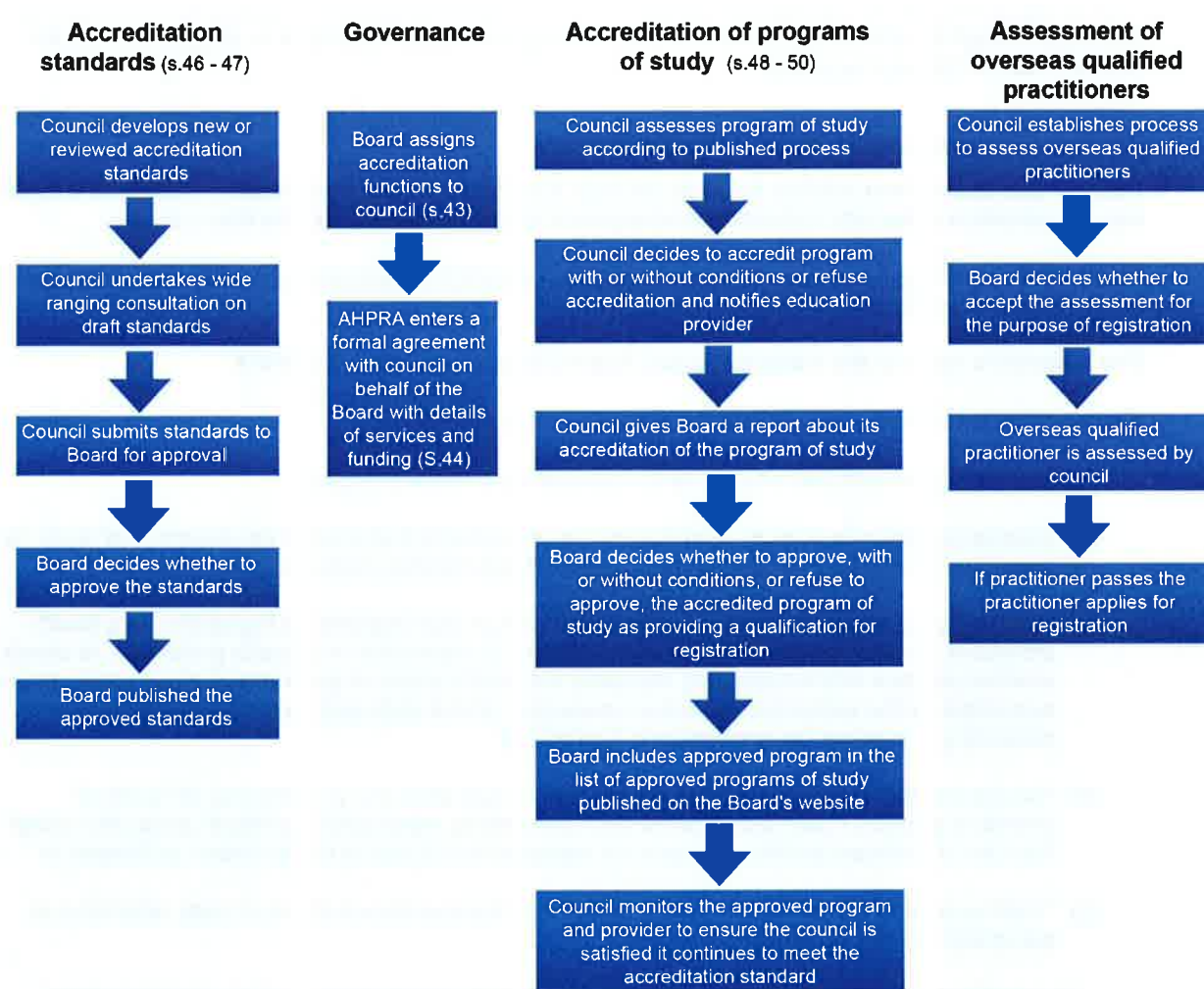
### **The respective roles of the National Board, Accreditation Council and AHPRA**

Section 42 of the National Law defines the accreditation function as:

- (a) developing accreditation standards for approval by a National Board
- (b) assessing programs of study, and the education providers that provide the programs of study, to determine whether the programs meet approved accreditation standards
- (c) \*assessing authorities in other countries who conduct examinations for registration in a health profession, or accredit programs of study relevant to registration in a health profession, to decide whether persons who successfully complete the examinations or programs of study conducted or accredited by the authorities have the knowledge, clinical skills and professional attributes necessary to practise the profession in Australia or
- (d) \*overseeing the assessment of the knowledge, clinical skills and professional attributes of overseas qualified health practitioners who are seeking registration in a health profession under this Law and whose qualifications are not approved qualifications for the health profession or
- (e) \*making recommendations and giving advice to a National Board about a matter referred to in paragraph (a), (b), (c) or (d).

*\* The Accreditation Council for nursing and midwifery currently does not undertake s42(c) and (d) for the National Board.*

The following diagram describes the respective roles of the National Board, Accreditation Council and AHPRA.



## 2. Scope of the National Board review

### Options open to the National Board

The following options are open to the National Board:

1. continue the existing arrangements of assigning accreditation functions to the Accreditation Council
2. appoint an alternative external accreditation entity, where an entity with the appropriate skills, expertise and infrastructure exists and is willing to take on the role
3. establish an accreditation committee of the National Board

A combination of some of the above options may also be possible.

### 3. Consultation process

#### **Making a submission**

Section 6 of this consultation paper sets out each domain of the Quality Framework and refers to the evidence that the National Board has considered in forming its view about how the current accreditation arrangements are working.

Information provided by the Accreditation Council describing how it has undertaken the accreditation functions is attached and referenced for each domain.

There are spaces for comments throughout the paper.

To make a submission:

1. please save the document as a word document;
2. complete your comments in the spaces provided;
3. save the document with your name and the name or acronym of the Accreditation Council in the document name; and
4. email the document to [accreditationreview@ahpra.gov.au](mailto:accreditationreview@ahpra.gov.au) by close of business Friday on 7 December 2012.

#### **How submissions will be handled**

As part of the public consultation process, the National Board will acknowledge submissions received.

Submissions will generally be published unless you request otherwise. The National Board publishes submissions on its [website](#) to encourage discussion and inform the community and stakeholders.

However, the National Board will not place on its website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of reference. Before publication, the National Board may remove personally-identifying information from submissions, including contact details.

The views expressed in the submissions are those of the individuals or organisations who submit them and their publication does not imply any acceptance of, or agreement with, these views by the National Board.

The National Board also accepts submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982* (Cth), which has provisions designed to protect personal information and information given in confidence. Please let the National Board know if you do not want us to publish your submission, or want us to treat all or part of it as confidential.

However, due to the nature of this review, while there may be a request not to publish a submission publicly, the National Board will provide all submissions to the Accreditation Council.

The National Board may choose to consult with key stakeholders individually in addition to the National Board's broader consultation processes published at <http://www.ahpra.gov.au/Legislation-andPublications/AHPRA-Publications.aspx>

If you would like clarification or further information about any aspects of this consultation process, please contact Julie Reeves, Senior Policy Officer by email: [Julie.reeves@ahpra.gov.au](mailto:Julie.reeves@ahpra.gov.au) or by phone: (03) 8708 9363.

## 4. Your submission

**Name of person or organisation**

**making the submission:** Australian Nursing Federation (Victorian Branch) RTO Toid 3601

**Contact person:** Ann Vintiadis Education Centre Manager ANF Victorian Branch

**Telephone:** 03 9275 9333

**Email:** records@anfvic.asn.au

### 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 -**

- ☐ The Accreditation Council has undertaken an accreditation assessment of one or more of our education programs since 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 previously



❖ **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 the Accreditation Council

❖ **Other stakeholders**

- ☐ Have sought information or advice from the Accreditation Council on other matters
- ☐ The Accreditation Council has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments
- ☒ Involved the Accreditation Council activities eg accreditation or assessment processes
- ☐ Little or no direct engagement with the Accreditation Council
- ☐ 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 National Board has taken into account in forming its preliminary view about governance is primarily on pages 10 to 13 of the ANMAC report published on the Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

#### ❖ Comments

We acknowledge that the Accreditation Council is a legal entity and performs its governance functions in accordance with the attributes listed.



## **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 National Board has taken into account in forming its preliminary view about independence is primarily on pages 14 to 16 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

### **❖ Comments**

We acknowledge that the Accreditation Council performs its accreditation operations independently, and that there are processes and procedures in place to manage conflicts of interest.

### 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 National Board has taken into account in forming its preliminary view about operational management is primarily on pages 17 to 19 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

#### ❖ Comments

We acknowledge that the Accreditation Council endeavours to operate efficiently in managing its human and financial resources. It is important to note that given the period of time required for an RTO to await the outcome of the accreditation process (12 months), and the fact that ANMAC Assessors are not paid for their services, may lead one to conclude that perhaps ANMAC is not funded at the level it requires to provide the Accreditation processes in a more efficient and timely manner.

#### **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 National Board has taken into account in forming its preliminary view about accreditation standards is primarily on pages 20 to 21 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

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#### **❖ Comments**

We acknowledge that the Accreditation Council develops appropriate standards for the assessment of curricula and education providers.

### **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 are publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. Its 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 National Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily on pages 22 to 24 of ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>. It is also based on the experience of the National Board in receiving accreditation reports for the accreditation decisions reported to the National Board for approval in the period 1 July 2010 to 1 August 2012.

#### **❖ Comments**

We acknowledge that the Accreditation Council has developed robust, vigorous and equitable processes which are utilized in the assessment of programs of study and providers of education.  
As an ANMAC assessor, I have had the opportunity to utilize these processes and can attest to their validity.

### 5.6 Assessing authorities in other countries (than Australia) (Domain 6):

Where this function is exercised by the Accreditation Council, the authority has defined standards and procedures to assess examining and/or accrediting authorities in other countries

#### Attributes

- The assessment standards aim to determine whether these authorities' processes result in practitioners who have the knowledge, clinical skills and professional attributes necessary to practice in the equivalent profession in Australia.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The procedures for initiating consideration of the standards and procedures of authorities in other countries are defined and documented.
- There is a cyclical assessment process to ensure recognised authorities in other countries continue to meet the defined standards.
- The Accreditation Council follows documented systems for decision-making and reporting that enable decisions to be made free from undue influence by any interested party.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

#### Assessing authorities in other countries (than Australia) – Accreditation Council submission

#### ❖ Comments

***\* The Accreditation Council for nursing and midwifery currently does not assess authorities in other countries for the National Board and, therefore, this domain does not form part of the review***

### 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

#### ❖ Comments

***\*The Accreditation Council for nursing and midwifery currently does not assess overseas qualified practitioners for the National Board and, therefore, this domain does not form part of the review.***

### **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 National Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily on pages 25 to 28 of the ANMAC report published on the National Board's website: <http://www.nursingmidwiferyboard.gov.au/News/Current-Consultations.aspx>

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#### **❖ Comments**

We acknowledge the collaborative role the Accreditation Council employs involving a range of stakeholders.



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

The National Board 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 independent Accreditation Council, the Australian Nursing and Midwifery Accreditation Council [ANMAC] against the Quality Framework for the accreditation function as referenced in section 5 above and the National Board's experience working with the Accreditation Council over the past two years.

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

The National Board formed a preliminary view based on the ANMAC submission, that the current accreditation arrangement for an independent Accreditation Council is satisfactory and, that the accreditation function for the nursing and midwifery professions is to be exercised by the Australian Nursing and Midwifery Accreditation Council beyond the period assigned by the Australian Health Workforce Ministerial Council (i.e 30 June 2013).

#### ❖ **To what extent are you in agreement with the preliminary view of the National Board?**

Strongly disagree

Strongly agree

☐ 1☐ 2☐ 3☐ 4☒ 5

#### ❖ **Please provide comments about the National Board's preliminary view**

We would agree with the National Board's view. It is apparent that ANMAC has earned the right to continue to provide the accreditation function for the nursing and midwifery professions. Our only comment relates to the possible need to review ANMAC's funding arrangements, since it does appear that the organization is underfunded.