



## Response template for the proposed principles on strengthening the involvement of consumers in accreditation - public consultation

February 2024

This response template is the preferred way to submit your feedback to the public consultation on the draft proposed principles to strengthen the involvement of consumers in accreditation.

Please provide any feedback in this document, including your responses to the questions in the text boxes on the following pages. The boxes will expand to accommodate your response. You do not need to respond to a question if you have no comment.

### Making a submission

Please complete this response template and email to [AC\\_consultation@ahpra.gov.au](mailto:AC_consultation@ahpra.gov.au) using the subject line 'Feedback: Public consultation on principles to strengthen the involvement of consumers in accreditation'. Consultation closes on 18 April 2024.

### Publication of submissions

We publish submissions at our discretion. We generally publish submissions on our [website](#) to encourage discussion and inform the community and stakeholders about consultation responses. Please let us know below if you do not want your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove personally identifying information from submissions, including contact details.

We can accept 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 These submissions will not be published on the website or elsewhere.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. A 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 us know if you do not want us to publish your submission or if you want us to treat all or part of it as confidential.

**Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is expressly requested.**

Do you want your responses to be published?

- Yes – please publish my response with my name
- Yes – please publish my response but don't publish my name
- No – I do not want my responses to be published.

### Stakeholder details

Please provide your details in the following table:

<b>Name:</b>	Tim Budden
<b>Organisation name:</b>	Australian Dental and Oral Health Therapists Associations

## Your responses to the consultation questions

<b>1. Does any content need to be added to or amended in the draft proposed principles?</b>
<p>In section 3 “defining consumers in the context of these principles” we would like to see peak professional bodies included as a stakeholder under “directly involved consumers.” We do note Ahpra have recognised this is not an exhaustive list, but specific inclusion of peak representative bodies is important. ADOHTA, as the representative body and voice for all dental and oral health therapists, sees great benefit in being involved in the health care accreditation system. We also have a strong interest in ensuring consumer viewpoints and issues are represented and addressed.</p> <p>Principle 2: Recruitment ADOHTA would like to see it mandatory that accreditation authorities have at least one Aboriginal and/or Torres Strait Islander consumer involved.</p> <p>Principle 5: Diversity ADOHTA would like to see the language changed in a number of sentences. “Accreditation authorities <del>should</del> <b>MUST</b> involve a broad range of consumers to facilitate diversity of input into the design and delivery of accreditation functions.” “Accreditation authorities <del>should</del> <b>MUST</b> establish minimum requirements to ensure they involve health consumers as a consumer group.” “Accreditation authorities <del>should</del> <b>MUST</b> ensure the strategies they use to enable the involvement of Aboriginal and Torres Strait Islander Peoples are codesigned, based on self-determination and Indigenous led.” This is particularly important for the last point – codesign must shift away as an option.</p>
<b>2. Are there any implementation issues the Accreditation Committee should be aware of?</b>
No comment.
<b>3. Are there any potential, unintended consequences of the draft principles?</b>
<p>There may be some resistance from professional bodies, educational institutions, and accreditation bodies from increased consumer involvement in accreditation. Frequent and transparent communication will help in providing assurance to any concerned parties.</p> <p>Additional funding and resourcing will be required to appropriately train consumers.</p>
<b>4. Do you have any general comments or feedback about the draft proposed principles?</b>
No further comments, ADOHTA is supportive of the proposed principles and strongly supports a stronger involvement of consumers in accreditation.