



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 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 These submissions will not be published on the website or elsewhere.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:

Name:	Anton Barnett-Harris, CEO
Organisation name:	Australian Physiotherapy Council

Your responses to the consultation questions

1. Does any content need to be added to or amended in the draft proposed principles?

The Australian Physiotherapy Council (the Council) is grateful for the opportunity to provide comment on the Ahpra Board Accreditation Committee's (the Committee) draft *Proposed principles for strengthening the involvement of consumers in accreditation* (the draft proposed principles).

The Council does not believe any content needs to be added to or amended in the draft proposed principles.

2. Are there any implementation issues the Accreditation Committee should be aware of?

The Council appreciates the significant benefits of diversity of input into accreditation functions. At the same time, it is essential that governance boards, committees, and other sub-committees and working groups are of a manageable size to ensure they can remain effective and efficient. This may be compromised if consumers are restricted to representing only one population group at a time, and multiple representatives of particular groups should be included. The Council suggests that multiple groups and viewpoints can be represented by one person.

3. Are there any potential, unintended consequences of the draft principles?

The Council welcomes ongoing improvements to ensure consumers are included in accreditation functions and processes. It is recommended that care should be taken to avoid excessive reliance on consumers bringing minority perspectives, as this could lead to burnout.

It is important that consumers participating in accreditation represent a broad consumer base. To mitigate the risk of excessive focus on individual agendas, it may be beneficial if consumers involved in accreditation are linked to other consumers in some way, for example, being part of a consumer organisation or advocacy network.

4. Do you have any general comments or feedback about the draft proposed principles?

The Council commends the Committee on the changes made to the draft proposed principles following preliminary consultation on this topic. The guidance is considered comprehensive, and the layout of the document is very user-friendly, especially with respect to the principles themselves.

The Council recognises the value of including the views of various stakeholders in accreditation functions. Consumers are currently involved in the Council's work in a number of ways, such as the inclusion of higher education professionals and clinicians on accreditation assessor panels, as well as non-practitioner members of our Board and committees, including First Nations representatives. The Council supports ongoing efforts to ensure consumers are included in accreditation functions and processes so that these continue to be aligned with community needs.