



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 These submissions will not be published on the website or elsewhere.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:	Dr Ali Drummond
Organisation name:	Congress of Aboriginal and Torres Strait Islander Nurses and Midwives (CATSINaM)

Your responses to the consultation questions

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

- **Regarding Principle 1: Governance structures and processes:** Accreditation structures, processes and policies need to support equity in consumer involvement and recognise power imbalances that can create barriers to participation. CATSINaM recommends the following inclusions:

Accreditation authorities should have appropriate structures processes and policies in place to support equitable consumer involvement across all areas of their work.

Accreditation authorities should:

- *carefully consider which consumers are most suited to specific projects or activities and how and when they will be involved to ensure they are appropriately and effectively supported to can contribute in a meaningful way,*

- **Principle 2: Recruitment:** CATSINaM proposes the following inclusions to both clarify and enhance the intent and impact of this Principle:

- *Accreditation authorities should proactively seek and involve consumers from marginalised and/or hard to reach groups and communities.*

- **Principle 3: Communication:** CATSINaM proposes the following inclusions to both clarify and enhance the intent and impact of this Principle:

Accreditation authorities should:

- *be respectful, empathetic, culturally safe and respectful to Aboriginal and Torres Strait Islander peoples, and culturally and psychologically safe in every interaction with consumers*
- *ensure communication between consumers and accreditation authorities is fair, transparent, culturally safety and respectful*
- *communicate information in a way that is accessible and easily understood by all consumers*
- *provide consumers with appropriate information and resources to enable them to determine their suitability for the role, and to gain an understanding of the purpose and value of their involvement, and*
- *ensure consumers are clearly informed and involved in what happens to their input, including how and where it is published.*

- **Principle 4: Support:** CATSINaM proposes the following inclusions to both clarify and enhance the intent and impact of this Principle:

Accreditation authorities should:

- *support their staff to seek consumer involvement and provide relevant training to enable culturally safe and respectful to Aboriginal and Torres Strait Islander peoples, and culturally and psychologically safe and meaningful engagement*
- *provide strategies to support staff in the elimination of interpersonal and institutional racism and its impacts on consumers, with specific strategies addressing the impacts on Aboriginal and Torres Strait Islander consumers*

- **Principle 5: Diversity:** CATSINaM proposes the following inclusions to both clarify and enhance the intent and impact of this Principle:

Accreditation authorities should ensure the strategies they use to enable the involvement of Aboriginal and Torres Strait Islander Peoples are culturally safe, codesigned, based on and uphold self-determination and Aboriginal and Torres Strait Islander Indigenous led. This will support Aboriginal and Torres Strait Islander Peoples to:

- work in **genuine** partnership with accreditation authorities to define problems and develop solutions¹
- participate in decisions that affect their lives **and communities**, including a formal recognition of their community identities
- have control over their lives and future including economic, social and cultural development².

We note that the dot pointed principles above adapt a human rights approach which, while fundamental to protecting Aboriginal and Torres Strait Islander self-determination, are complex and broad concepts that lack clarity in this context. Particularly the statement "...including a formal recognition of their community identities". This statement requires clarification to provide appropriate guidance.

CATSINaM recommends that the framing of Principle 5 align with [National Agreement on Closing the Gap Priority Reforms](#) that seek to change the way of developing and implementing policies and programs that impact Aboriginal and Torres Strait Islander peoples.

Please refer to CATSINaM's responses to Question 4 below.

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

See response to Question 4.

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

No comment.

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

Cultural Safety Obligations

As an overarching consideration, the Principles, and all relevant accreditation functions and activity, must support compliance obligations arising from the inclusion of cultural safety objectives in the National Law. Section 3A of the National Law sets the explicit expectation that national registration and accreditation scheme will '*...ensure the development of a culturally safe and respectful health workforce that (i) is responsive to Aboriginal and Torres Strait Islander Peoples and their health; and (ii) contributes to the elimination of racism in the provision of health services; Example— Codes and guidelines developed and approved by National Boards under section 39 may provide guidance to health practitioners about the provision of culturally safe and respectful health care.*'³

Referencing the *National Agreement on Closing the Gap*

¹ Adapted from NSW Government, Agency for Clinical Innovation, Accessed from <https://aci.health.nsw.gov.au/projects/co-design>, 3 October 2023.

² Adapted from Australian Human Rights Commission, Aboriginal and Torres Strait Islander Social Justice, accessed from <https://humanrights.gov.au/our-work/aboriginal-and-torres-strait-islander-social-justice/self-determination#:~:text=At%20its%20core%2C%20self%2Ddetermination,our%20own%20values%20and%20beliefs>, 18 September 2023.

³ Health Practitioner Regulation National Law Act 2009 Current as at 20 September 2023, viewed 18 Oct 2023, [*Health Practitioner Regulation National Law Act 2009 \(legislation.qld.gov.au\)](#)

CATSINaM recommends the Principles align with [National Agreement on Closing the Gap Priority Reforms](#). The Priority Reforms seek to change the way policies and programs that impact Aboriginal and Torres Strait Islander peoples are developed and implemented.

The National Agreement aims to drive “[...an unprecedented shift in the way governments work, by encompassing shared decision-making on the design, implementation, monitoring and evaluation of policies and programs to improve life outcomes for Aboriginal and Torres Strait Islander people.](#)”

The National Agreement objective is to overcome entrenched inequality face by many Aboriginal and Torres Strait Islander peoples. The outcomes sought by, and Priority Reform Areas of, the Agreement are: 1) Shared decision-making; 2) Building the community-controlled sector; 3) Improving mainstream institutions; 4) Aboriginal and Torres Strait Islander-led data.