

## 5. Your submission

**Name of person or organisation**

**making the submission:** Optometrists Association Australia

**Contact person:**

**Telephone:**

**Email:**

### 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 Council has undertaken an accreditation assessment of one or more of our education programs since the introduction of the National Scheme
- The Council undertook an accreditation assessment of one or more of our education programs before 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 Council

❖ **Overseas qualified practitioner:**

- Assessment completed
- Assessment nearing completion
- Assessment just commencing
- Have sought information or advice from the Council

❖ **Other stakeholders**

- Have sought information or advice from the Council on other matters
- Council has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments
- Involved Council activities eg accreditation or assessment processes
- Little or no direct engagement with Council
- Other – please specify OAA has nominated an OCANZ member.

## 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 Board has taken into account in forming its preliminary view about governance is primarily at (*refer to pages 4-5 then 23-90 of 369 of the attached PDF report from OCANZ*)

#### ❖ Comments

Optometrists Association Australia (OAA) note that evidence supporting OCANZ's attainment of 6 of these 7 attributes appears to have been provided, however, we also note that a thorough assessment of their attainment of the third and the final attributes listed above requires specialist accounting and legal expertise which OAA does not have. With regard to the sixth attribute listed above, we note that OCANZ's governance structure facilitates input from key stakeholders. Whilst its current arrangements do not include specific input at the governance level from community members or the education sector, OCANZ has outlined a commitment to rectify this in the short term.

## 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 Board has taken into account in forming its preliminary view about independence is primarily at (*refer to pages 6-7 then 91-98 of 369 of the attached PDF report from OCANZ*).

### ❖ Comments

Based on the evidence provided OCANZ appears to meet both of these required attributes.

### 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 Board has taken into account in forming its preliminary view about operational management is primarily at (*refer to pages 8-9 then 99 of 111 of 369 of the attached PDF report from OCANZ*).

#### ❖ Comments

Based on the evidence provided, four of the five attributes listed above appear to met by OCANZ. In relation to the fourth attribute listed, OAA believes that inadequate information has been provided to assess the robustness of OCANZ's information and record management systems; the information provided does not detail measures taken to ensure the security of data (such as candidate information and examination materials.)

#### 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 Board has taken into account in forming its preliminary view about accreditation standards is primarily at *(refer to pages 10-11 then 112-215 of 369 of the attached PDF report from OCANZ)*.

##### ❖ Comments

Based on the evidence provided it appears that OCANZ meets the first two of the attributes listed above, and has activity planned that would see it achieve the remaining three attributes.

### 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 is publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. It's 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 Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily in the attached *PDF* report from OCANZ (*refer to pages 12-15 then 216 to 268 of 369*) and is also based on the experience of the National Board in receiving accreditation reports for the accreditation decisions reported to the Board in the period 1 July 2010 to 1 August 2012.

#### ❖ Comments

OAA note that based on the evidence provided, OCANZ appear to meet all of the attributes listed above (with the exception of the fourth attribute listed for which OAA does not have the appropriate expertise to offer comment) in relation to the accreditation of undergraduate degrees. The information provided does not appear to address accreditation of post-graduate therapeutic courses, an important role which OCANZ also performs, and based on the evidence provided OCANZ's achievement of the attributes above in relation to that function cannot be fully assessed.

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

The Board does not require OCANZ to assess 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.

The Board is satisfied that the objects of the OCANZ constitution allows for OCANZ to take on this function if required by the Board in the future.

❖ **Comments**

N/A

### 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

The evidence that the Board has taken into account in forming its preliminary view about assessing overseas qualified practitioners is primarily at (*refer to pages 17-18 then 269-369 of 369 of the attached PDF report from OCANZ*).

#### ❖ Comments

Based on the evidence provided, OCANZ appears to meet all of the attributes listed above. (We note that further information regarding policies for the selection, appointment, training and performance monitoring of assessors is found elsewhere in the documentation provided.)

### 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 Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily at *(refer to pages 19-20 of the attached PDF report from OCANZ)*.

#### ❖ Comments

OAA believes there is insufficient evidence provided to assess OCANZ's achievement of the first attribute listed above; whilst OCANZ lists examples of documents that have been developed/revised with the aid of a consultation process it is unclear what stakeholders were engaged in these consultations. OAA does, however, note OCANZ's commitment to stakeholder engagement, which is reflected in its governance structure.

With regard to the second attribute listed, we note OCANZ has an established website that is used as a communication tool, however believe that more proactive communications may be required in some instances, for example, to support robust consultation processes. OCANZ may well have such communication strategies in place, however, this is not evidenced in the documentation provided.

OAA believes that OCANZ meets the third and fourth attributes listed above and the documentation provided suggests that the final attribute listed above will be achieved with regard to future work.

## 6. 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 OCANZ against the Quality Framework for the Accreditation Function as referenced in section 5 above and the Board's experience working with the Council over the last two years.

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

Based on the preliminary review, the view of the National Board is that the current accreditation arrangement is satisfactory and that the accreditation function for the optometry profession is to be exercised by the Optometry Council of Australia and New Zealand beyond the period assigned by Ministerial Council. The Board reserved their decision on the period for which the function would be assigned until the conclusion of the consultation process

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

Strongly disagree

Strongly agree

 1 2 3 4 5

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

OAA notes that OCANZ has considerable expertise and credibility in accreditation and in assessment of overseas trained optometrists. They have shown a commitment to stakeholder engagement and to quality improvement, by developing and improving upon a range of resources over time. In agreement with the OBA, we believe that the current accreditation function for the profession is satisfactory and that this function should continue to be assigned to OCANZ.